TSD File Inventory Index

Date: May 16, 2007
Initial: CMcGovern

Facility Name:	Washtenaw Industrial Facility, LLC
Facility Identification Number:	MID 980 995 512

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1.			

Note: Transmittal Letter to Be Included with Reports.
Comments:_____

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

4th Floor, State Office Building
301 E. Louis Glick Hwy., Jackson, Michigan 49201

October 31, 1989

Raymond Jusak
Manager of Environmental Facilities
Johnson Controls, Inc.
825 Victors Way
P.O. Box 1003
Ann Arbor, MI 48106

Dear Mr. Jusak:

Re: MID 980795512

On September 21, 1989, staff of the Department of Natural Resources, conducted an inspection of your facility located at 290 Monroe Street in Saline, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended. Enclosed is a copy of the inspection report.

As a result of that inspection, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. The inactive surface impoundment's fence no longer provides an adequate artificial barrier as required by 40 CFR 265.14(b)(2)(i). A section of fence knocked down by a fallen tree on the south side of the impoundment needs to be repaired.

2. Three monitoring wells were not locked. Although the surface impoundment is located in a woods, it is not totally remote from residences in the area. It would be in your best interests to have the wells properly secured to prevent any tampering with them.

I am aware of the current debate over the regulatory status of your facility and would appreciate your continued cooperation in complying with the RCRA/Act 64 requirements.

Please respond to this letter by November 30, 1989 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Carolyn B. Parker
Environmental Engineer
Waste Management Division
517-788-9598

CBP:lt

Enclosure

cc: Lonnie Lee, WMD
U.S. EPA

August 8, 1985

Mr. Joe Gorn
Universal Die Cast
232 Monroe Street
Saline, MI 48176

Re: MID 980795512

Dear Mr. Gorn:

The Department of Natural Resources has received the material you submitted on July 31, 1985 in response to deficiencies revealed in the July 16, 1985 inspection, which this Department performed as a representative of the U.S. Environmental Protection Agency to determine compliance with the provisions of the Resource Conservation and Recovery Act, (RCRA).

Your submittal has addressed the concerns that were raised as a result of the inspection, and is adequate demonstration of compliance with the provisions of RCRA evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Staff will return to your facility to verify compliance.

Should you have any questions, please contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Lee Carter
Water Quality Specialist
517-322-1300

LC/ms

cc: Hazardous Waste Division
U.S. EPA - Region V w/attachment

UNIVERSAL
DIE CASTING, INC.

Corporate Office/Saline Plant
232 Monroe Street
Saline, Michigan 48176
313-429-9411

Malvern Plant
1002 East Section Line
Malvern, Arkansas 72104
501-332-3611

Little Rock Plant
8423 Frazier Pike
Little Rock, Arkansas 72206
501-490-2413

July 31, 1985

Mr. Lee Carter
Department of Natural Resources
Hazardous Waste Division
Lansing, MI 48909

Dear Mr. Carter:

Per your letter of July 18, 1985, enclosed is the updated Contingency Plan for Universal Die Casting, Inc.

Also enclosed are copies of two notices supporting the appointment of Joe Gorn to Operations Manager and now to Vice President of Saline Operations.

If any further information is required, please contact me.

Sincerely,

UNIVERSAL DIE CASTING, INC.

Ann Brown

Ann M. Brown
Administrative Assistant

AMB/ddm

Enclosures

July 18, 1985

Joe Gorn, Plant Manager
Universal Die Cast
732 Monroe Street
Saline, MI 48176

Re: MID 980795512

Dear Mr. Gorn:

On July 16, 1985, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at 732 Monroe in Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. Attached is a copy of the inspection report.

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. The contingency plan was not updated to reflect the change in emergency coordinator as required in 40 CFR 265.37(d).

We request that you respond to this letter by August 1, 1985 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Lee Carter
Water Quality Specialist
517-322-1300

LC/ms

Attachment

cc: U.S. EPA - Region V
Hazardous Waste Division

November 13, 1984

Mr. Raymond Gallatin
Universal Die Casting, Inc.
Corporate Office/Saline Plant
232 Monroe Street
Saline, MI 48176

Re: MID 980795512

Dear Mr. Gallatin:

The Department of Natural Resources has received the material you submitted on October 18, 1984 in response to deficiencies revealed in the July 31, 1984 inspection, which this Department performed as a representative of the U.S. Environmental Protection Agency to determine compliance with the provisions of the Resource Conservation and Recovery Act, (RCRA).

Your submittal has addressed the concerns that were raised as a result of the inspection, and is adequate demonstration of compliance with the provisions of RCRA evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Staff will return to your facility to verify compliance.

Should you have any questions, please contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch, Supervisor
Lansing District
517-322-1300

REB/ms

cc: Hazardous Waste Division
U.S. EPA - Region V

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

File Copy YES 12-12-84

October 30, 1984

MID 980795512

Ms. Mary Higgins
U.S. EPA Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Ms. Higgins:

Enclosed for your records are updated copies of the Compliance and Enforcement Log and Facility Status Sheet for Universal Die Casting, Inc. in Saline, Michigan. These forms were completed as a part of our closure plan review.

If you have any questions concerning the attached information, please contact Hien Nguyen or me at (517) 373-2730.

Sincerely,

Kenneth Burda

Kenneth Burda
Chief, Permits Unit
Hazardous Waste Division

Enclosures

cc: J. Bohunsky
A. Howard
R. Basch

October 3, 1984

Mr. Raymond H. Gallatin
Plant Manager
Universal Die Casting, Inc.
732 Monroe Street
Saline, MI 48176

Re: MID 980795512

Dear Mr. Gallatin:

On July 31, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. As a follow-up to that inspection you were sent a letter, dated August 14, 1984, outlining 11 deficiencies found during the inspection. In response, you sent a letter, dated September 5, 1984, which included various documents. I visited your facility and discussed the various deficiencies with Mr. Murray of your staff.

All issues have been resolved except for the training program required in 40 CFR Part 265.16. I indicated to Mr. Murray that the information submitted did not adequately address the training required. Specifically, the workers who handle hazardous waste need to receive appropriate training in various areas including, but not limited to, response to emergencies or spills, inspection and repair and replacement of emergency equipment. I recommended to Mr. Murray that he review 40 CFR Part 265.16, especially 265.16(a)(3) which indicates the minimum elements in a training program.

I would also recommend that your Company develop an index which describes the information being collected and the location in the plant of same to comply with the requirement to maintain an operating record in 40 CFR Parts 265.73, especially Section 265.73(b)2 through 265.73(b)7.

I would request that you respond to this letter by October 18, 1984 providing documentation to this office regarding those actions taken to correct these deficiencies.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch, Supervisor
Lansing District
517-322-1300

REB/ms

cc: Hazardous Waste Division
U.S. EPA - Region V

MID 980795512

UNIVERSAL
DIE CASTING, INC.

Corporate Office/Saline Plant
232 Monroe Street
Saline, Michigan 48176
313-429-9411

Malvern Plant
1002 East Section Line
Malvern, Arkansas 72104
501-332-3611

Little Rock Plant
8423 Frazier Pike
Little Rock, Arkansas 72206
501-490-2413

RECEIVE
SEP 11 1984
SWQD-Lansing District

YES 11-20-84
Status Code X

Hoover Universal Inc.

September 5, 1984

Mr. Robert E. Basch, District Supervisor
Hazardous Waste Division
P.O. Box 3002B
Lansing, Michigan 48909

Dear Mr. Basch:

This communication from Universal Die Casting, Inc. is in response to your letter of August I4, 1984 arising from your facility inspection of July 31, 1984.

A reiteration of issues you felt did not appear to be in full compliance and our actual status areas follows:

1. The facility did not document all inspections and produce and inspection log as required in 40 CFR Part 265.15. (See Exhibit I)

2. The facility did not document personnel training as requested in 40 CFR Part 265.16. (See Exhibit II)

3. The facility did not document attempts to make arrangements with local authorities concerning an emergency as required in 40 CFR Part 265.37. (See Exhibit III)

4. The facility did not have an up to date contingency plan as required in 40 CFR Part 265.52. (See Exhibit III)

   Original contingency plan 4/30/75 updated 2/9/84 did not include arrangements with local authorities. A new and much improved plan based on rules from federal and state environmental regulations has been developed. Encompassed in that plan are arrangements with local authorities for emergencies.

5. The facility did not have an estimate of closure costs nor did the facility have an organized operating record as required in 40 CFR Part 265.73. (See Exhibit IV)

6. The facility could not produce all records for inspection as required under 40 CFR Part 265.74. (See Exhibit IV and plant had other records)

7. The facility could not produce groundwater sampling and analysis plan required under 40 CFR Part 265.92. (See Exhibit V)

8. The facility could not produce an outline of a comprehensive groundwater quality assessment program required under 40 CFR Part 265.93. (See Exhibit V)

9. The facility has not performed the statistical analysis required under 40 CFR Part 265.93 c(b). (See Exhibit V)

   Enclosed are analytical results accumulated for the last three quarters for well monitoring. The fourth quarter well monitoring tests will be performed in September by Canton Analytical Laboratories. Statistical analysis (t-test) and assessment will be completed at that point as per 40 CFR Part 265.93 c(b), and forwarded.

10. The facility did not produce a complete closure plan for the waste treatment and storage lagoons as required in 40 CFR 265.112. (See Exhibit VI)

11. The facility did not produce logs or other documentation pertaining to the daily and weekly inspections of the lagoon required in 40 CFR Part 265.225 and 265.226.

    Prior to February 1, 1984, under the ownership of Hoover Universal, the lagoons were improperly identified in Form 3 RCRA (Hazardous Waste Permit Application). The lagoons were listed as TO1, treatment tanks. On May 24, 1984, Mr. Allen Debus of Region V, U.S., E.P.A., instructed Universal Die Casting, Inc. to classify the lagoons as SO2, storage tanks. As a result, we will begin recording daily inspections of the lagoons. Previously, daily inspections were made but not recorded. Effluent discharge from the filter press passes through lagoon #1, lagoon #2, and enter outfall #001 to the Saline river. That effluent is analyzed on a daily basis and recorded. Solid waste in the lagoon is F006 (wastewater treatment sludges from electroplating operations). Universal Die Casting, Inc. will begin monitoring that sludge on a routine basis by analysis.

If additional information or documentation is required, please advise. Thank you for the time extension to September 10, 1984 per our phone discussion on August 7, 1984.

Sincerely,

Raymond H. Gallatin

Raymond H. Gallatin
Plant Manager
Corporate Office/Saline Plant

ab
Enclosures

August 14, 1984

Mr. Ray Callatin, Plant Manager
Universal Die Casting
232 Monroe Street
Saline, MI 48176

Re: MID 980795512

Dear Mr. Callatin:

On July 31, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the inspection report is attached.

As a result of that investigation, staff of the Department have determined that the above facility appears to be in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. The facility did not document all inspections and produce an inspection log as required in 40 CFR Part 265.15.

2. The facility did not document personnel training as requested in 40 CFR Part 265.16.

3. The facility did not document attempts to make arrangements with local authorities concerning an emergency as required in 40 CFR Part 265.37.

4. The facility did not have an up to date contingency plan as required in 40 CFR Part 265.52.

5. The facility did not have an estimate of closure costs nor did the facility have an organized operating record as required in 40 CFR Part 265.73.

6. The facility could not produce all records for inspection as required under 40 CFR Part 265.74.

7. The facility could not produce the groundwater sampling and analysis plan required under 40 CFR Part 265.92.

8. The facility could not produce an outline of a comprehensive groundwater quality assessment program required under 40 CFR Part 265.93.

9. The facility has not performed the statistical analysis required under 40 CFR Part 265.93 d (b).

10. The facility did not produce a complete closure plan for the waste treatment and storage lagoons as required in 40 CFR Part 265.112.

11. The facility did not produce logs or other documentation pertaining to the daily and weekly inspections of the lagoons required in 40 CFR Part 265.225 and 265.226.

I discussed these deficiencies with Mr. Murray, Technical Director, for this facility. It was apparent that this facility may be in compliance with many, if not all of these deficiencies. However, since Mr. Murray was newly assigned this area of responsibility he was unable to locate the records or documentation of compliance. Additionally as I discussed with both Mr. Murray and you this facility should better organize and coordinate all of the records so that compliance can be shown by your company. I or my staff are available to advise you regarding RCRA requirements and any other questions concerning this program.

We request that you respond to this letter by September 3, 1984 providing documentaion to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Beach, Supervisor
Lansing District
517-322-1300

REB/mj

Enclosure

cc: Hazardous Waste Division
U.S. EPA - Region V

GEO 10-18-84
States 5
Codex

August 14, 1984

Mr. Ray Gallatin, Plant Manager
Universal Die Casting
232 Monroe Street
Saline, MI 48176

Re: MID 980795512

Dear Mr. Gallatin:

On July 31, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the inspection report is attached.

As a result of that investigation, staff of the Department have determined that the above facility appears to be in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. The facility did not document all inspections and produce an inspection log as required in 40 CFR Part 265.15.

2. The facility did not document personnel training as requested in 40 CFR Part 265.16.

3. The facility did not document attempts to make arrangements with local authorities concerning an emergency as required in 40 CFR Part 265.37.

4. The facility did not have an up to date contingency plan as required in 40 CFR Part 265.52.

5. The facility did not have an estimate of closure costs nor did the facility have an organized operating record as required in 40 CFR Part 265.73.

6. The facility could not produce all records for inspection as required under 40 CFR Part 265.74.

7. The facility could not produce the groundwater sampling and analysis plan required under 40 CFR Part 265.92.

8. The facility could not produce an outline of a comprehensive groundwater quality assessment program required under 40 CFR Part 265.93.

9. The facility has not performed the statistical analysis required under 40 CFR Part 265.93 c (b).

10. The facility did not produce a complete closure plan for the waste treatment and storage lagoons as required in 40 CFR Part 265.112.

11. The facility did not produce logs or other documentation pertaining to the daily and weekly inspections of the lagoons required in 40 CFR Part 265.225 and 265.226.

I discussed these deficiencies with Mr. Murray, Technical Director, for this facility. It was apparent that this facility may be in compliance with many, if not all of these deficiencies. However, since Mr. Murray was newly assigned this area of responsibility he was unable to locate the records or documentation of compliance. Additionally as I discussed with both Mr. Murray and you this facility should better organize and coordinate all of the records so that compliance can be shown by your company. I or my staff are available to advise you regarding RCRA requirements and any other questions concerning this program.

We request that you respond to this letter by September 3, 1984 providing documentaion to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch

Robert E. Basch, Supervisor
Lansing District
517-322-1300

REB/mj

Enclosure

cc: Hazardous Waste Division
U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: MID 980795512

Installation Name: Universal Die Casting

Location Address: 232 Monroe ST.

City: Saline State: Mich.

Date of inspection: 7-31-84 Time of inspection (from) 11:00A (to) _____

Person(s) interviewed	Title	Telephone
Ray Gallatin	Plant Mgr	313-429-9411
→ Bob Murray	Technical Dir	"

Inspector(s)	Agency/Title	Telephone
K Basch	MDNR/WQS	517-322-1300

Installation Activity (mark only one box)

Inspection Form(s)

- ☐ Treatment/Storage/~~Disposal~~ per 40 CFR 265.1 and/~~or~~ Generation ~~and/or Transportation~~ — (A)
- ☐ Treatment/Storage/Disposal (no generation or Transportation) — A
- ☐ Generation and Transportation — B, C
- ☐ Generation only — B
- ☐ Transportation only — C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	☐	storage in containers	I
S02	☐	storage in tanks	J
T01	☐	treatment in tanks	J
S04	☑	storage in surface impoundment	K,F
T02	☑	treatment in surface impoundment	K,F
D83	☐	disposal in surface impoundment	K,F
S03	☐	storage in waste pile	L
D81	☐	disposal by land application	M,F
D80	☐	disposal in landfill	N,F
T03	☐	treatment by incineration	O/P
T04	☐	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	☑	APPENDIX	GN
TRANSPORTER	☐	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

none

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

none

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?		✓		
b. Facility expansion?	✓			
c. Change of owner or operator?	✓			
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?		✓		Do routine analysis Treatment, not the facility
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				N/A
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance? or		✓		
b. i. Artificial or natural barrier around facility? and	✓			
ii. Controlled entry?		✓		
c. Danger sign(s) at entrance?		✓		
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?		✓		
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?		✓		
ii. safety and emergency equipment?				
iii. security devices?				
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?				
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?				
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?				
d. Are areas subject to spills inspected daily when in use?				
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?				
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?				
ii. the name of the inspector?				
iii. a notation of the observations made?				
iv. the date and nature of any repairs or remedial actions?				
5. Do personnel training records include: 265.16 - will have to locate				
a. Job titles?				
b. Job descriptions?				

	YES	NO	NI	Remarks
c. Description of training?	___	___	___	_____
d. Records of training?	___	___	___	_____
e. Did facility personnel receive the required training by 5-19-81?	___	___	___	_____
f. Do new personnel receive required training within six months?	___	___	___	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?				
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				N/A
a. Special handling?	___	___	___	_____
b. No smoking signs?	___	___	___	_____
c. Separation and protection from ignition sources?	___	___	___	_____

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	YES	NO	NI	Remarks
1. Maintenance and Operation of Facility: 265.31 Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?				N/A - clerical function

Indicate the volume of water and/or foam available for fire control:

_____

_____

3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			fire extinguishers
b. Is emergency equipment maintained in operable condition?	✓			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	✓			
5. Is there adequate aisle space for unobstructed movement?				N/A
→ 6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?				

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)				existing PIPP being upgraded
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?				Being Updated
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				N/A - Plant Closed
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53		✓		

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	✓			Bob Murray
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		✓		no emergency

Plan Tanks pumped out and inspected weekly

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)				N/A
b. Are records of past shipments retained for 3 years?				
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				N/A
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓			
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓			
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	✓			
***iii. A map or diagram of each cell or disposal area				N/A - not disposal

** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			in lab
v. Reports detailing all incidents that required implementation of the Contingency Plan?				Never had an incident
vi. All closure and post closure costs as applicable?		✓		
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?		✓		Somewhat - dispersed throughout plant not all records, evidently
5.**Unmanifested Waste Reports 265.76				N/A
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?				
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				

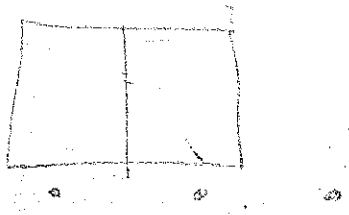
** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	✓			
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?		✓		
If "yes", skip to number 12. If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	✓			
Indicate the total number of up-gradient wells.				
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	✓			
Indicate the total number of downgradient wells.	3			
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	✓			

Sketch the locations of the wells relative to the waste management area.



	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	✓			
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				Contractually known
a. Sample collection?	✓			
b. Sample preservation and shipment?	✓			
c. Analytical procedures?	✓			
d. Chain of custody control?	✓			
5. Does the owner or operator follow his groundwater sampling and analysis plan?				? Presumably - as a private consultant
6. Is the groundwater sampling and analysis plan maintained at the facility?		✓		
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?		✓		

	YES	NO	NI	Remarks
8. Has the owner or operator developed an outline of a comprehensive groundwater quality assesment program that is capable of determining: 265.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?				
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?				
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?				
*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?		✓	X	However position was that DNR would do this
*10. Was there a statistically significant increase (or pH decrease) detected in any well?			X	?
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			X	
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?		✓		
a. Is the waiver demonstration maintained at the facility?				
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?		✓		
a. Has the plan been certified by a qualified geologist or geotechnical engineer?				

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?				
14. Does the owner or operator submit reports and maintain records as required in 265.94?				

Section G - OSURE AND POST CLOSURE (Part ? Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				Check on this since part of the
a. Is the facility closure plan available for inspection?	✓			
→ b. Does the plan identify:				lagoons or the plant itself - applies
i. maximum extent unclosed during facility life?	!			
ii. maximum hazardous waste inventory?				to the waste treatment storage disposal
iv. estimated year of closure?				facility - not the plant?
v. schedule of closure activities?				
c. Has closure begun?				
*2. Post-Closure 265.118 N/A				
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Pa. 265, Subpart I)

N/A

		YES	NO	NI	Remarks
1.	Are containers in good condition? 265.171	___	___	___	_____
2.	Are containers compatible with waste in them? 265.172	___	___	___	_____
3.	Are containers managed to prevent leaks? 265.173	___	___	___	_____
4.	Are containers stored closed?	___	___	___	_____
5.	Are containers inspected weekly for leaks and defects.	___	___	___	_____
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	___	___	___	_____
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	___	___	___	_____
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	_____

Section J - TANKS (Part 265, Subp J)

N/A

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
5. Are required daily and weekly inspections done? 265.194				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)				

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section K - URFACE IMPOUNDMENTS (Part 265, bpart K)

		YES	NO	NI	Remarks
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	✓			
2.	Do earthen dikes have protective covers? 265.223	✓			
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225				units don't change
→ 4.	Is the freeboard level inspected at least daily? 265.226	✓			
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	✓			not logged.
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229				N/A
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				N/A

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

N/A

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

Section M - LAND TREATMENT (Part 265, Subpart M)

N/A

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.272	___	___	___	_____
2. Are run-off and run-on diverted from the facility or collected				
3. Is waste analyzed according to 265.273?	___	___	___	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	___	___	___	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	___	___	___	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	___	___	___	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	___	___	___	_____

Section N - LANDFILLS (Part 265, Subpart N)

N/A

	YES	NO	NI	Remarks
1. General Operating Requirements 265.302 Does the facility provide the following:				
a. Diversion of run-on away from active portions of the fill?	___	___	___	_____
b. Collection of run-off from active portions of the fill?	___	___	___	_____
c. Is collected run off treated?	___	___	___	_____
d. Control of wind dispersal of hazardous waste?	___	___	___	_____
2. Surveying and Recordkeeping 265.309 Does the Operating Record Include:				
a. A map showing the exact location and dimensions of each cell?	___	___	___	_____
b. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312	___	___	___	_____
4. Special Requirements for Incompatible Wastes. 265.313 Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

	YES	NO	NI	Remarks
5. Special requirements for liquid waste 265.314				
a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.				
i. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
ii. Does the landfill have a functional leachate collection system?	___	___	___	_____
iii. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
b. Have containers holding free liquids been placed in landfill since March 22, 1982?	___	___	___	_____
6. Special requirements for Containers 265.315 Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

N/A

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State I=incinerator T=thermal

   a. Type of unit (i.e., type of incinerator or thermal treatment): _____

   b. Components and steady state condition: I 265.343 T 265.373

   Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks

2. Waste Analysis I 265.345 T 265.375

   a. Minimum requirements, for wastes not previously burned/treated.

      i. Required analyses; has an analysis been performed for the following?

Heating value				
Halogen content				
Sulfur content				

      ii. Has documented or written data been substituted for analysis of either:

Lead?				
Mercury:				

b. List other paramters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. Monitoring and Inspections I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
b. Is steady state maintained or corrections attempted?	___	___	___	_____
c. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
d. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____

**Specify in Remarks for what period of time this was checked.

g. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____
4. Open Burning T 265.382 (open burning does not apply to incineration)				
a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).	___	___	___	_____

	YES	NO	NI	Remarks
ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	26			
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of Generator	✓			
c. Name and EPA ID Number of Transporter(s)?	✓			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. ∅

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. ∅

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	✓			
3. If required, are placards available to transporters of hazardous waste? 262.33	✓			

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box [ ] and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 1], 1982 Revision

N/A

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

N/A

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50				

(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:

UNIVERSAL DIE CASTING, INC.
232 Monroe St.
Saline, MI 48176

SPILL PREVENTION AND CONTINGENCY PLAN

1984

HOT LINE

Saline Fire Dept.	911	
Saline Police Dept.	911	
Saline Community Hospital	429-5435	
Environmental Waste Control	357-5680	
	561-1400	
Saline DPW	429-4907	#244

TABLE OF CONTENTS

ON-SITE
ENVIRONMENTAL EMERGENCY PROCEDURES

Emergency Coordinator's Response to an On-Site Emergency

1. Assess type of emergency and determine whether personnel or environmental hazard exists. Such hazard exists if the answer to any of the following questions is yes:

   A. Is there a fire that is, or could be (if not expeditiously brought under control), a threat to human health or the environment?
   B. Are corrosive vapors being generated that could be a threat to human health or the environment?
   C. Is there or could there be (as a result of A or B above) a spill that would be a threat to human health or the environment? (See Appendices A and B.)

2. If no personnel or environmental hazard exists, take normal housekeeping control and clean up action.

3. If a personnel or environmental hazard does exist:

   A. Alert all personnel to avoid or evacuate the hazard area.
   B. Notify the in-plant response team to control hazard (see p. II-2) as follows:

      1) Fire
         a. Combustible toxic oil (will support flame)
            (1) Use A.B.C. fire extinguishers.
            (2) Use dirt, sand, gravel to smother flames.
            (3) Do Not use water.
         b. Toluene transfer valves (extremely flammable)
            (1) Use A.B.C. fire extinguishers.
            (2) Shut off feed valve located at mix tank.
            (3) Do Not use water.
      2) Spill (Spill equipment located in storage building - see site plan)
         a. Combustible toxic oil (if it escapes diked containment area)
            (1) Prevent its flow into sewers or off site by using diversion or absorbant methods.
            (2) Keep from open flame.
            (3) Do not ingest.
            (4) Once contained, use "oil dry," cloths, or any oil absorbing material to solidify oil. Place in adequate container for dispostion.
         b. Corrosive chemicals (liquid and vapors cause extreme burns)
            (1) Wear acid protection equipment (gloves, face shields, boots, respirator, etc.) before contacting substance or its vapors.
            (2) Contain with lime, oil dry, or other dry, neutral substance.

(3) Place dried, absorbed substance in a container that is corrosion resistant (neutralize with lime if possible).
(4) Dispose of properly.

c. Flammable toluene (keep away from sparks or flame)
(1) Contain with dry, absorbant material.
(2) Dispose of properly.

3) Corrosive Vapors (causes extreme burns on contact)
a. Wear acid protection equipment (gloves, face shield, respirator, boots, etc.).
b. Contain with lime, oil dry, or neutral substance.
c. Once dried and neutralized, place in corrosion-resistant container for disposal.

4. If outside help is needed:

A. Notify respective agency:

Agency	Telephone
Saline Fire Department	373-3473
Saline Police Department	283-4357
Saline Community Hospital	283-7425
Environmental Waste Control	404-622-8712
Saline DPW	313-429-4907,#244

B. Identify to agency:

1) Character of substance involved (toxic, flammable, etc.)
2) Source (leaking tank, hose, etc.)
3) Amount (one gallon, 500 gallons)
4) Real extent of release (in confined area, in river)
5) Your assessment of hazard and possible complications

5. Take control measures to minimize incident and prevent spread (shut down operation, system, etc.).

6. Monitor event for additive or extraneous hazards.

7. Arrange for treat, transport, and disposal of hazardous residues.

8. Avoid incompatible or cross contamination exposure of hazardous residues.

9. Restore and replace emergency equipment to proper operating order and location.

10. Record event. Include time, date, and details.

OFF-SITE
ENVIRONMENTAL EMERGENCY PROCEDURES

Emergency Coordinator's Response to an Off-Site Emergency

1. Do as Items 1 through 5 on pages I-1 and I-2 require.

2. If human health or the environment is threatened outside of the facility:

   A. If required (see note below), report to:

Michigan Department of Natural Resources Pollution Emergency	Universal Die Casting, Inc.
1-800-292-4706	Robert Murray Office: (313) 429-9411 Home: (313) 772-5105

   the following information:

   1) Your name and telephone number;
   2) Facility name and address;
   3) Time and type (fire, spill) of incident;
   4) Name and quantity of material;
   5) Injuries;
   6) Possible hazards outside of the facility.

   NOTE: Only a release, fire, or explosion which could threaten human health or the environment outside the facility must be reported as above.

   Example: A release of toxic substance onto adjoining ground that is controlled and being cleaned up properly would not require notification.

   Example: A release of toxic substance that is not under control and is proceeding toward a water supply would require notification.

   B. Within 15 days, file a report to the Regional E.P.A. administrator as follows:

   1) Name, address, and telephone number of the owner or operator;
   2) Name, address, and telephone number of the facility;
   3) Date, time, and type of incident (e.g., fire, explosion);
   4) Name and quantity of material(s) involved;
   5) The extent of injuries, if any;

6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7) Estimated quantity and dispostion of recovered material that resulted from the incident.

3. Do as Items 6 through 10 on page I-2 require.

EMERGENCY PERSONNEL AND EQUIPMENT

Emergency Coordinators

	Name	Home Address	Home Phone	Office Phone
1.	Ray Gallatin	2856 Rodesiler Hwy. Deerfield, MI 49238	517-447-3240	313-492-9411
2.	Bill Powers	3362 Gove Court Tecumseh, MI 49286	517-423-5838	313-492-9411
3.	Robert Murray	517 N. Evans Road Tecumseh, MI 49286	313-772-5105	313-429-9411

Robert J. Murray, Technical Director, is assigned the overall responsibility of spill prevention and reporting.

Outside Pollution Control Assistance

Environmental Waste Control, Inc. 24901 Northwestern Hwy. Southfield, Michigan 48175	Carl W. Hornby Vice-President	313-357-5680

Security

This facility normally operates three shifts over a period of 24 hours, five days per week. Full access is restricted to authorized employees only. Control areas subject to tampering are restricted by locked fences, locked valves, or other devices where applicable. During off hours, facility is patrolled by:

State Security
1000 Cornwell Place
Ann Arbor, MI
313-848-6965

Emergency Response Crew

Name	Work Location Phone	Home Phone
Carl Wagner	313-429-9411 #234	517-423-2803
Tom Bennett	313-429-9411 #221	313-429-7768
Neil Lindemann	313-429-9411 #221	313-429-7685
Bill Marcum	313-429-9411 #266	313-482-5169

On-Site Emergency Equipment

1. 101 Fire Extinguishers in general manufacturing areas (See Site Plan)
2. Communication is internal and external telephone.
3. Water for putting out Class "A" fires located at perimeter of manufacturing and storage building (See Site Plan).

4. Spill control equipment located in storage building (See Site Plan).
    A. Squeegees, mops, shovels, bags of oil dry, rags, lights, and acid-proof gloves, boots, face shields, and respirators.
5. Alarm system is electric bell and voice.

Hazards on Site

A. Combustible liquid propane tank of 30,000 gallon total volume (See Site Plant #1).
B. Toxic, corrosive chemicals in drums and tanks (See Site Plan #1-2). (Causes extreme burns on contact.)
    a. cyanides, acids, alkali (sodium cyanide, sulfuric, caustic soda)
C. Flammable material in tanks (See Site Plan #1-2).
    a. solvents (toulene, acetone)

Notification

A copy of these contingency plans has been sent to the following agencies via certified mail:

1. Saline Police Department
   7605 N. Maple Road
   Saline, MI 48176

2. Saline Fire Department
   East Michigan Avenue
   Saline, MI 48176

3. Saline Community Hospital
   400 W. Russell
   Saline, MI 48176

4. Environmental Waste Control Inc.
   24901 Northwestern Hwy.
   Southfield, MI 48075

5. DNR
   Hazardous Waste Division
   Lansing, MI 48909

6. U.S. EPA - Region V
   Hazardous Waste Division
   RCRA Activities
   P.O. Box 7861
   Chicago, IL 60680

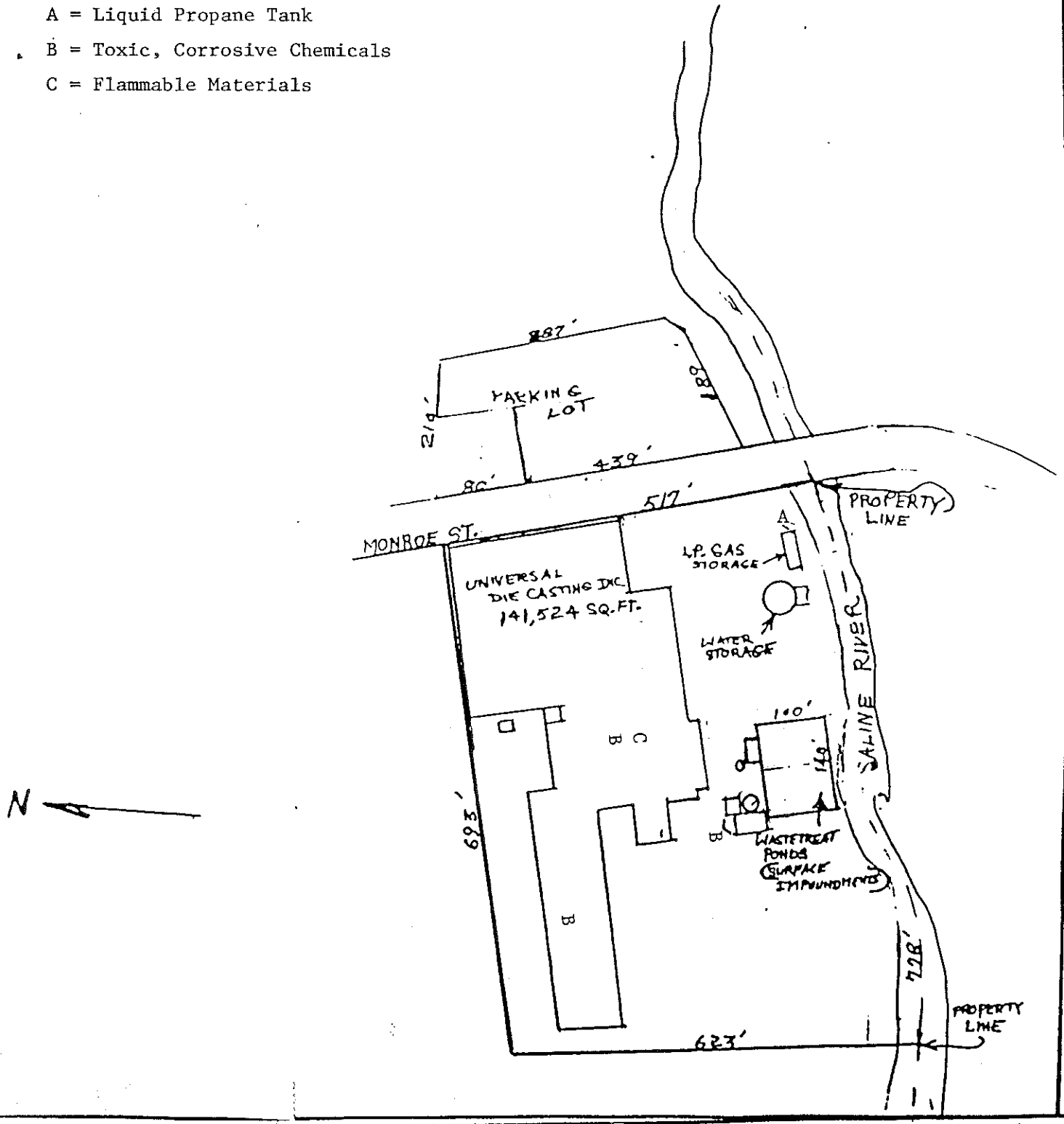
SITE PLAN #1

Legend

A = Liquid Propane Tank

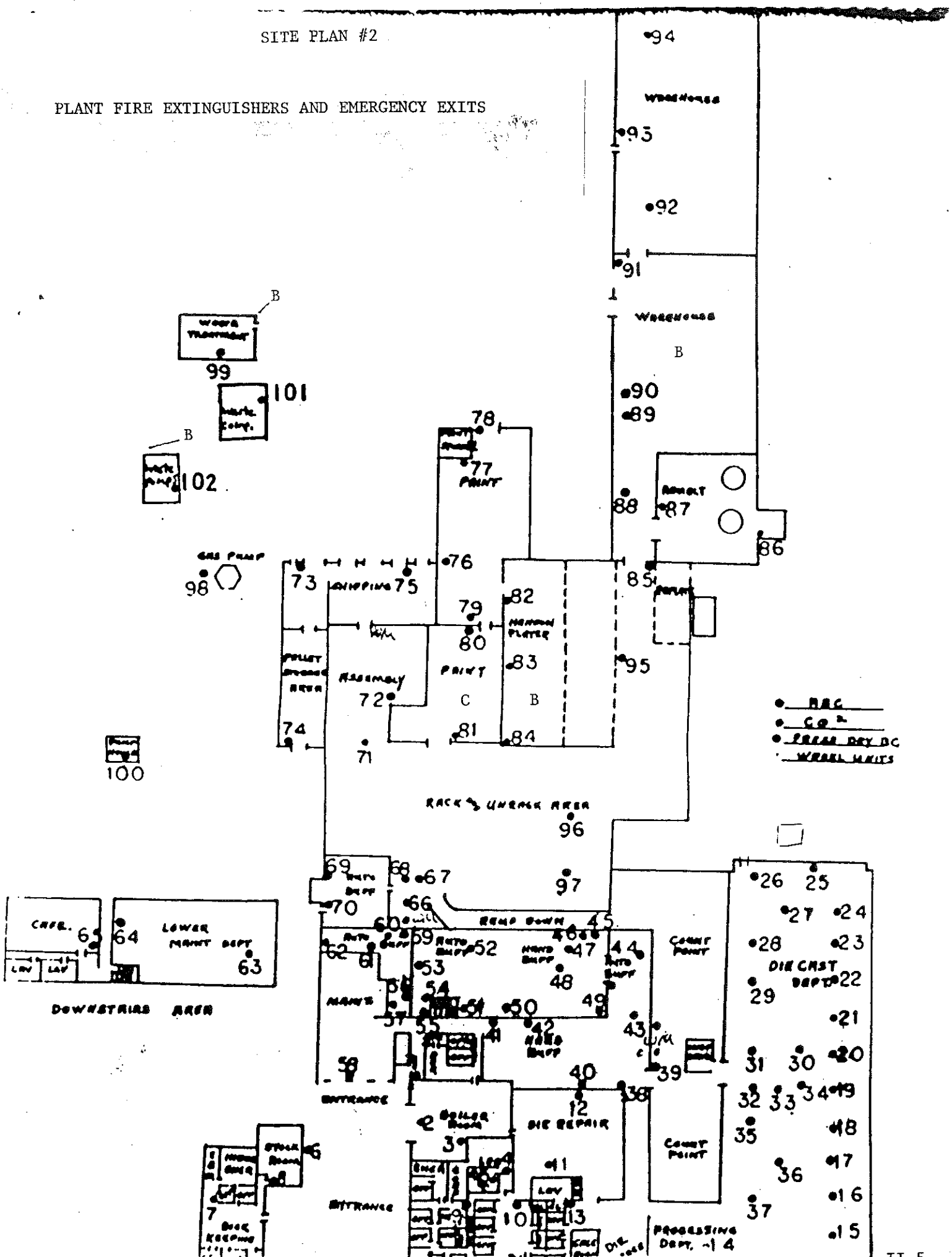
B = Toxic, Corrosive Chemicals

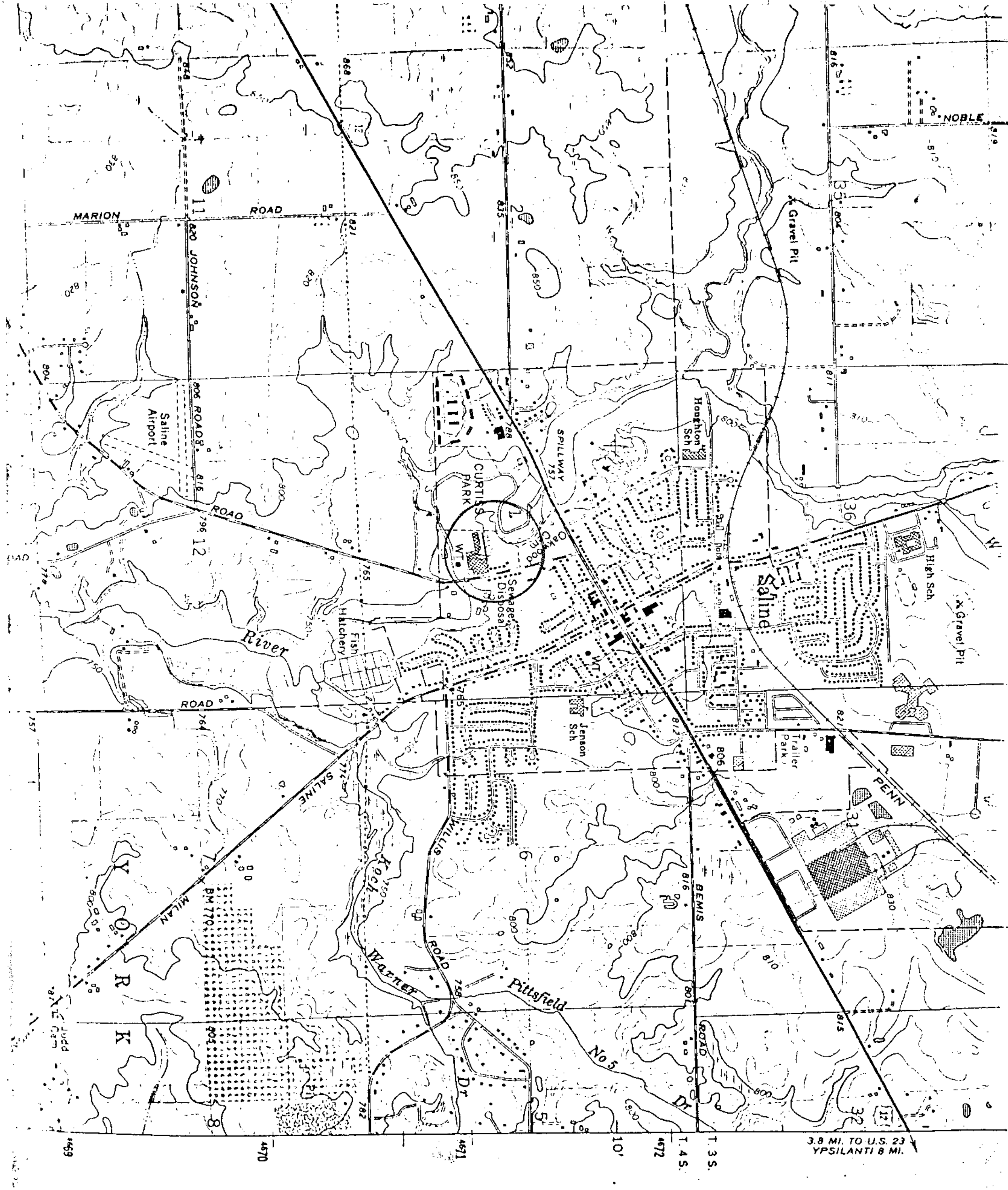
C = Flammable Materials



SITE PLAN #2

PLANT FIRE EXTINGUISHERS AND EMERGENCY EXITS




MARION ROAD
JOHNSON ROAD
NOBLE
Saline Airport
CURTISS PARK
SPILLWAY
Houghton Sch
Sewage Disposal
Fish Hatchery
River
ROAD
Saline
High Sch
Gravel Pit
Jenson Sch
Trailer Park
PENN
SALINE
MILAN
BM 770
WILLIS ROAD
Koch
Warner
Pittsfield No 5 Dr
BEMIS ROAD
T. 4 S.
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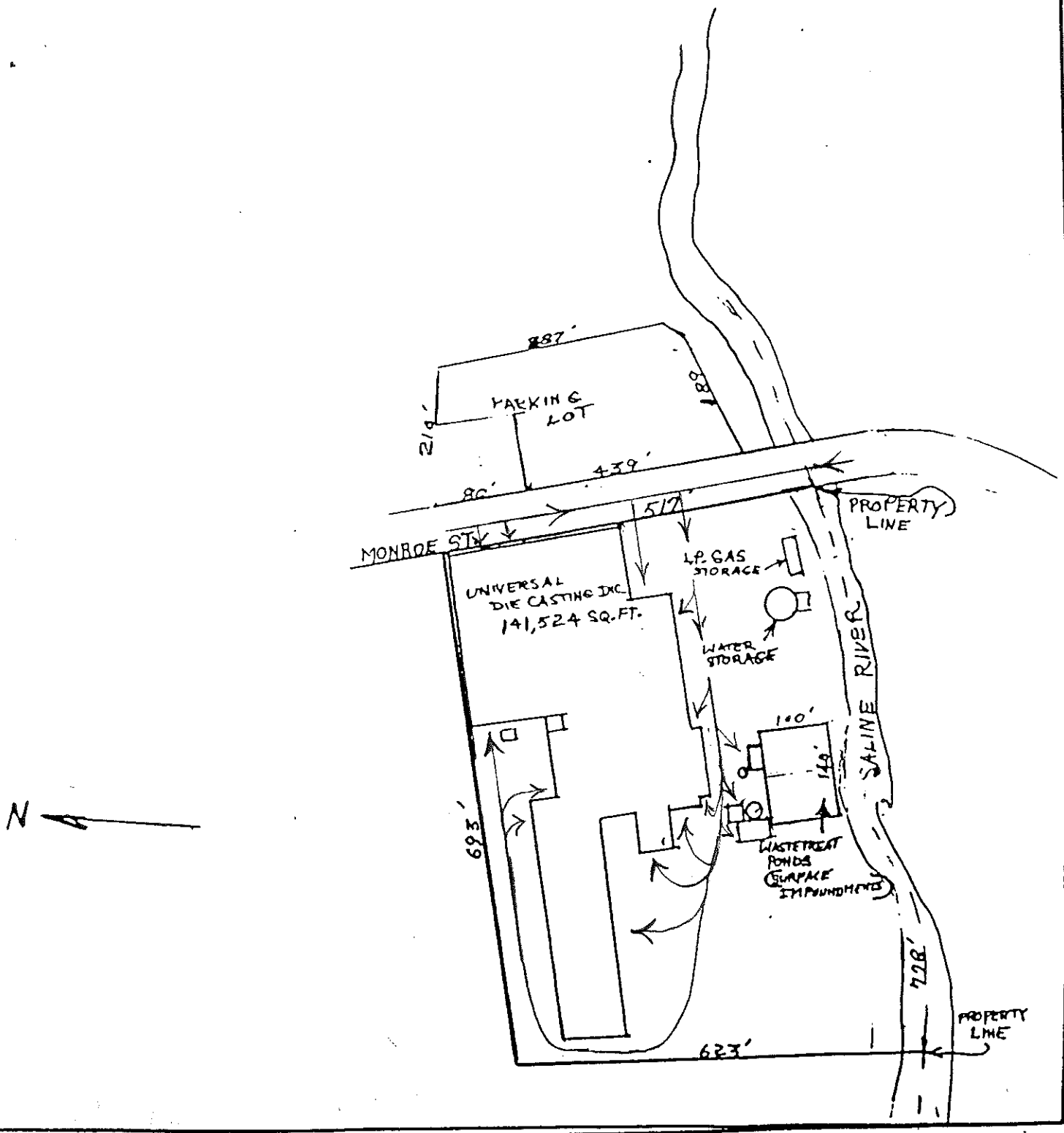
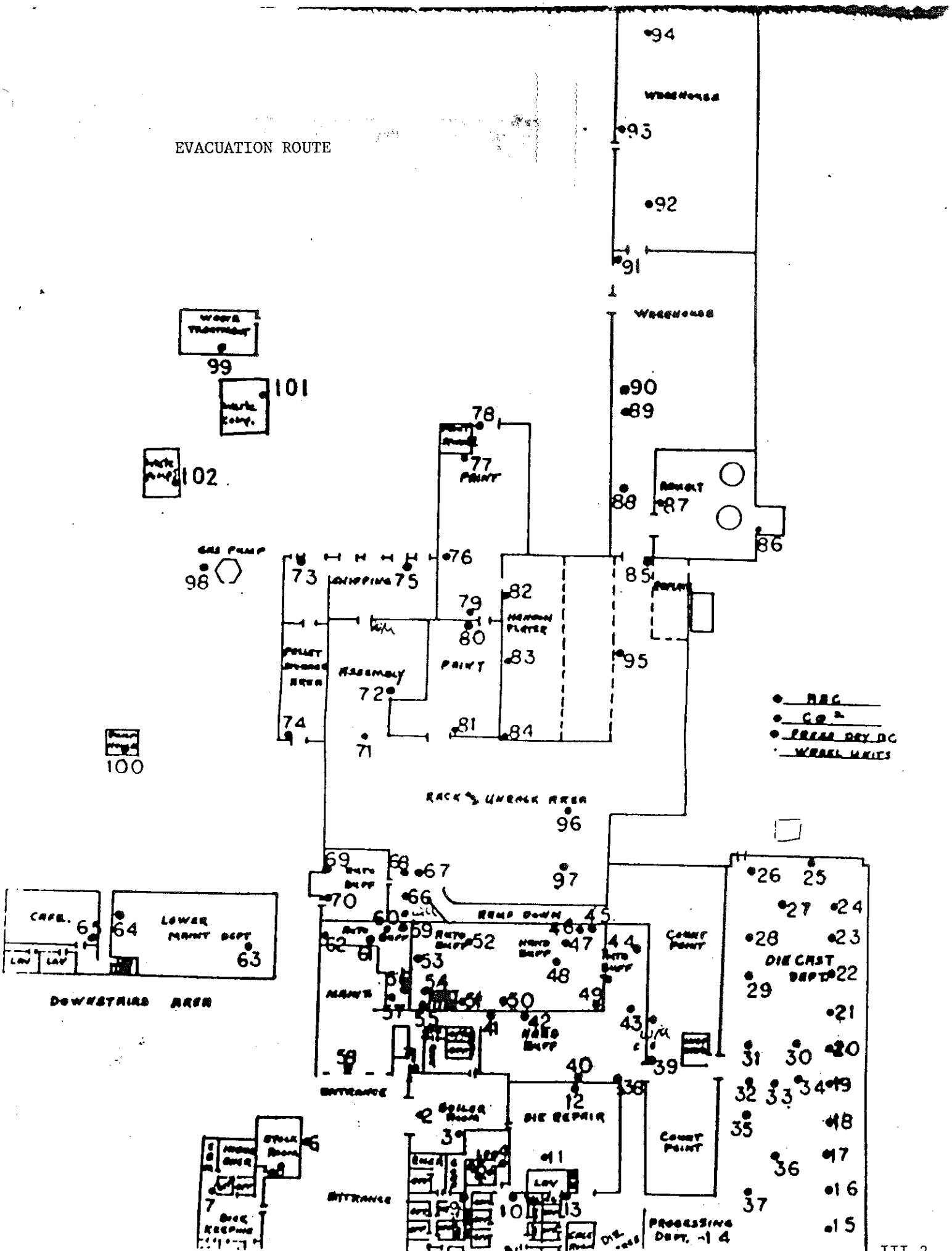
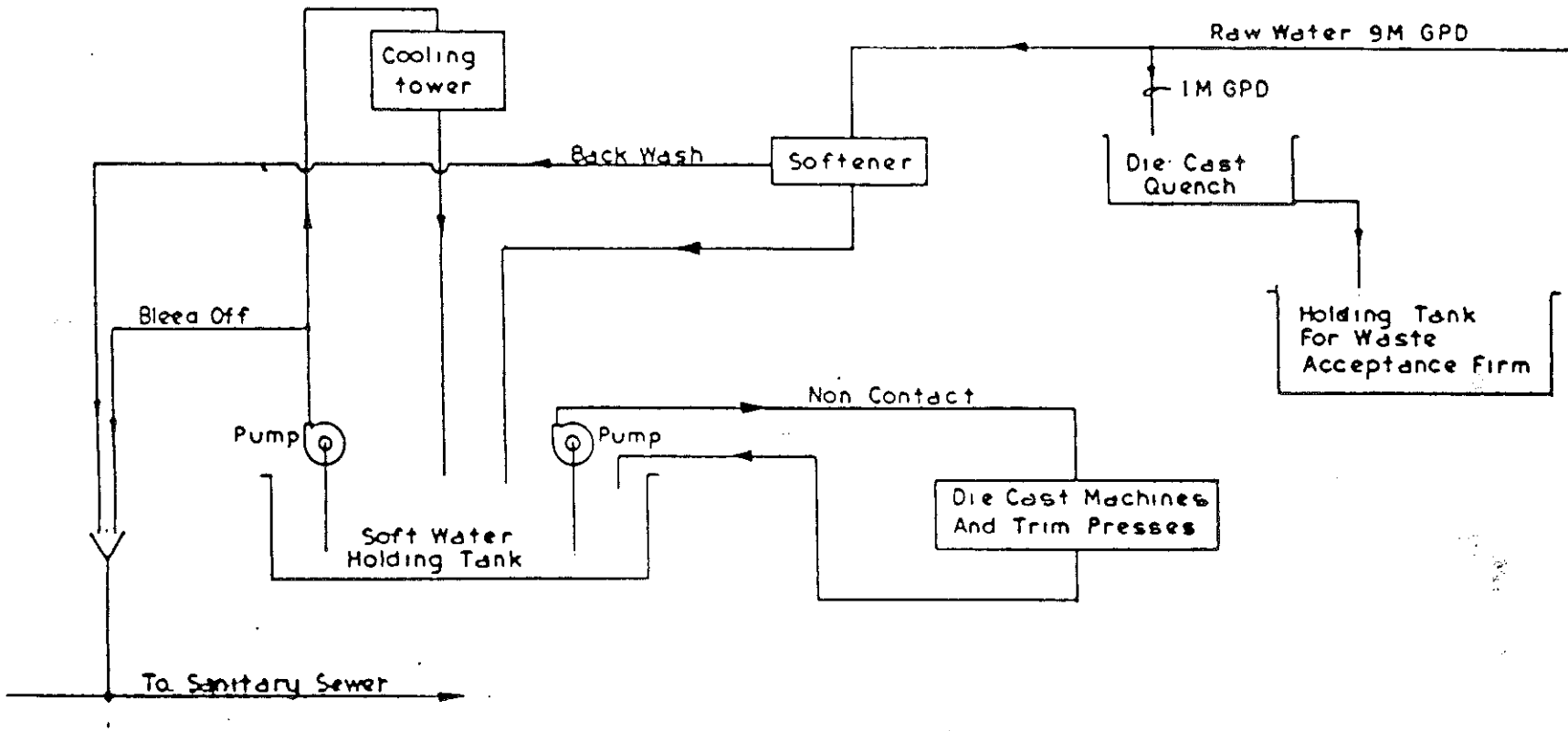
3.8 MI. TO U.S. 23
YPSILANTI 8 MI.

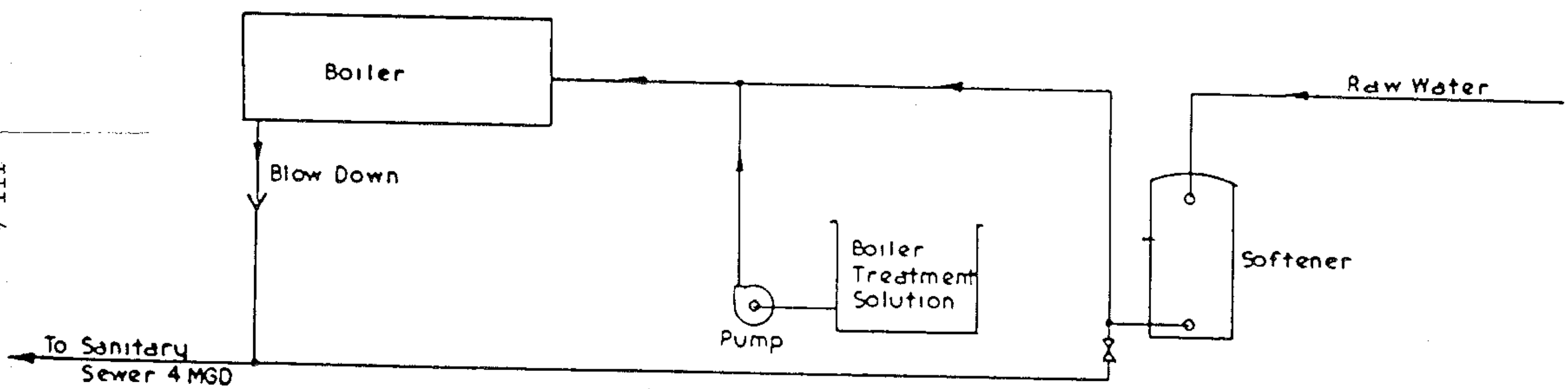
EMERGENCY
EQUIPMENT
ROUTE/ACCESS




EVACUATION ROUTE
WAREHOUSE
WAREHOUSE
WASTE TREATMENT
GAS PUMP
SHIPPING
PAINT
ASSEMBLY
PAINT
RACK & UNRACK AREA
RAMP DOWN
CAFE.
LOWER MAINT DEPT
DOWNSTAIRS AREA
MAINT.
ENTRANCE
BOILER ROOM
DIE REPAIR
ENTRANCE
DIE CAST DEPT
PROCESSING DEPT.
RBC
CO 2
FREON DRY DC
WHEEL UNITS



Hoover Ball and Bearing Co Universal Die Cast Div Saline Mich		
DATE 6-22-73		REVISED 2-10-7
Wast Treatment Plant Die Cast Dept		
Flow Diagram No 2		BIO-265



Hoover Ball and Bearing Co
Universal Die Cast Div Saline Mich

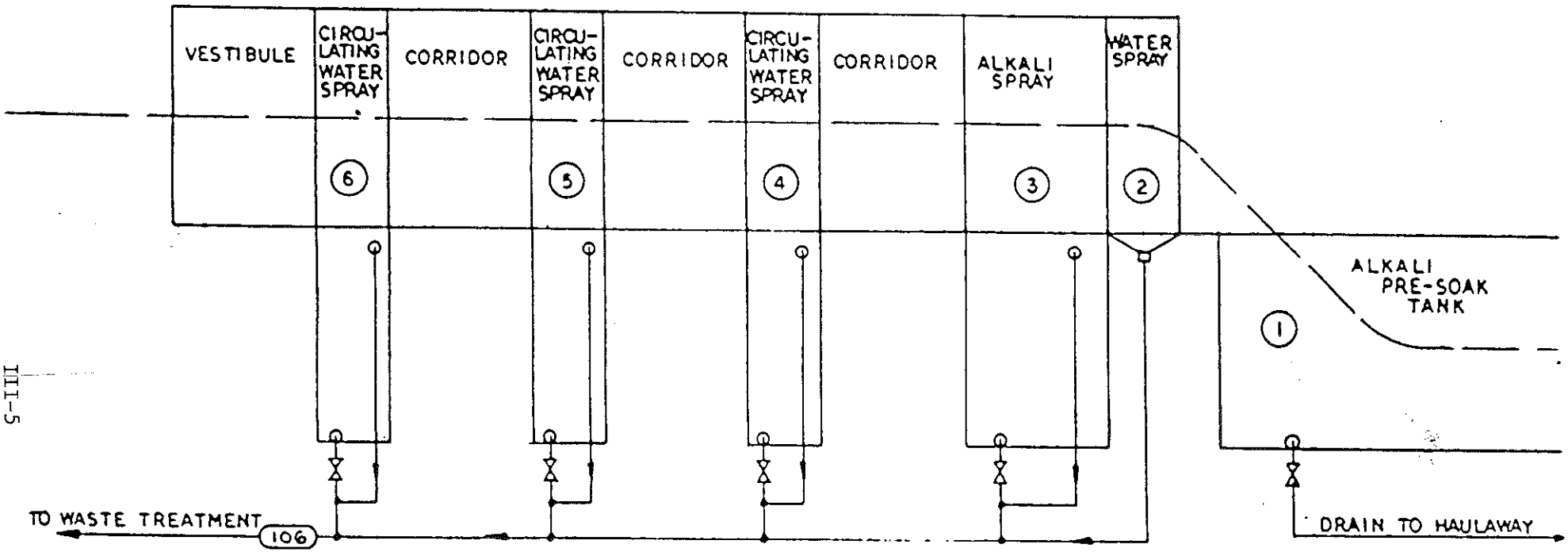
DATE 6-21-73

REVISED 2-10-7

Waste Treatment Plant — Boiler

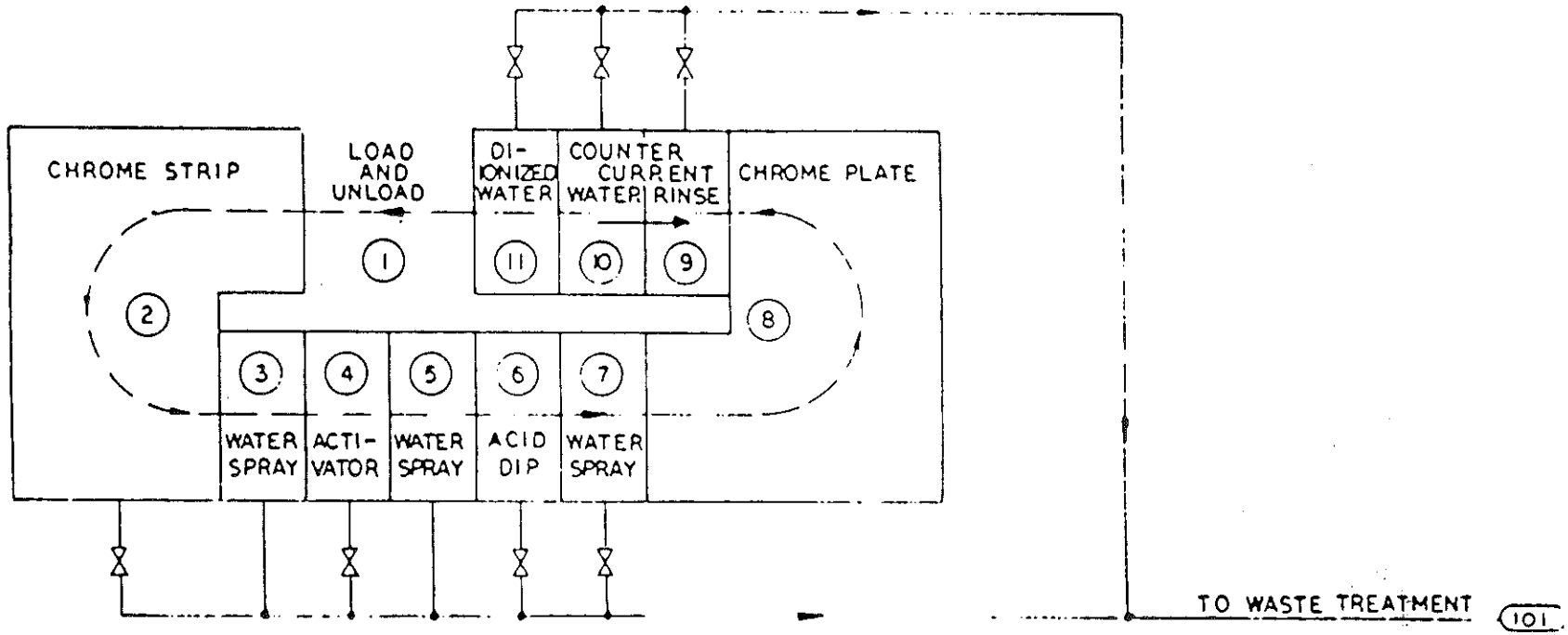
Flow Diagram No 3

B10 265

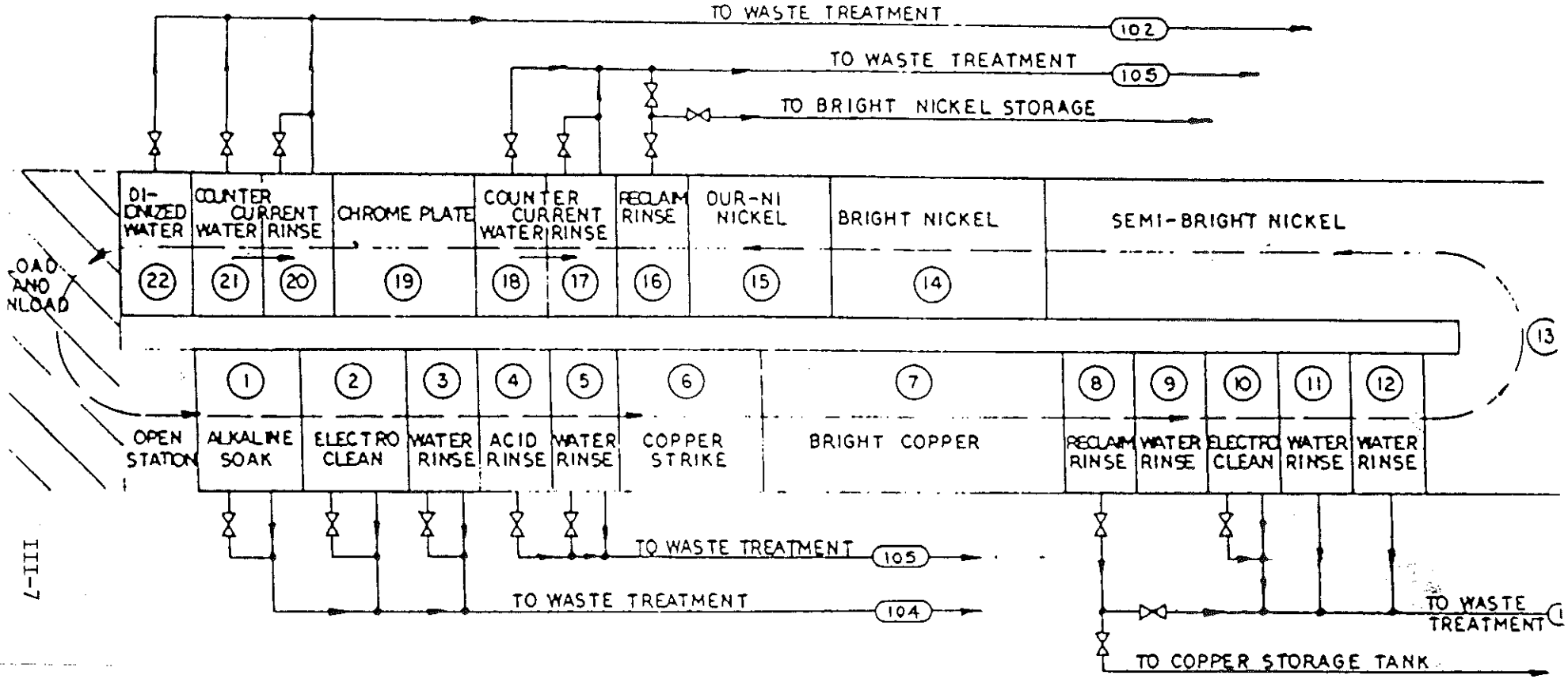


III-5

UNIVERSAL DIE CAST DIV. Saline, Michigan	
SCALE	APPROVED BY:
DATE: 1-23-75	REVISED 2-1(
WASTE TREATMENT 5 STAGE POWER WASHER AND PRE-SOAK	
PROCESS DIAGRAM NO 4	B10-26!



UNIVERSAL DIE CAST DIV. Saline Michigan	
SCALE: —	APPROVED BY:
DATE 1-23-75	DRAWN BY: X
WASTE TREATMENT UDYLITE AUTOMATIC-SINGLE FILE	
CHROME STRIP AND REPLATE PROCESS DIAGRAM NO 5	DRAWING NO. B10-26



III-7

UNIVERSAL DIE CAST DIV.
Saline, Michigan

SCALE	APPROVED BY:	DRAWN BY CH
DATE 1-23-75		REVISED 2-10

WASTE TREATMENT
HANSON AUTOMATIC - DOUBLE FILE

COPPER NICKEL CHROME
PROCESS DIAGRAM: NO 6

DRAWING NUMBER B10-265

INSPECTION PROCEDURES

1. At least weekly, inspections must be performed by an emergency coordinator or his designee.

2. Inspector must maintain and sign inspection log following each inspection.

3. Must inspect for:

   A. Leaks;
   B. Emergency equipment integrity (alarms, fire extinguishers, etc.);
   C. Containment structure integrity;
   D. Potential mechanical or operational failures;
   E. Evidence of damage or physical weakness that may create, allow, or contribute to a spill;
   F. Proper storage practices;
   G. Spills in loading or unloading areas..

4. Any irregularities, repairs, or violations related to spills or equipment must be logged.

5. Log must be kept with this plan.

INSPECTION SCHEDULE - ONCE/WEEKLY

(To be filled out and returned to lab.)

_____ 1) Inspect chrome and cyanide transfer pumps for leaks or overheating motors.

Problems: _____

_____

_____

_____

_____ 2) Inspect clarifier (valves, mixers, motors and probes).

Problems: _____

_____

_____

_____

_____

_____ 3) Treatment Tanks (condition - operating manuals)

Problems: _____

_____

_____

_____

_____

_____

_____ 4) Monitoring Equipment (pH meters, flow meters and recording meters)

Problems: _____

_____

_____

_____

_____

Inspection Schedule - ONCE/WEEKLY
(To be filled out and returned to lab.)

_____ 5) Chrome-cyanide-nickel discharge pumps (leaks, motor temperatures)
Problems: _____

_____ 6) Electrical Equipment (circuit breakers, overloads)
Problems: _____

_____ 7) Sulfuric Acid, Caustic Soda, Hypochloride, Polymer Tank Cleaners - Condition
Problems: _____

_____ 8) Spills or any condition that is out of the ordinary.
Problems: _____

_____ 9) Filter Press (pumps, motors, leaks)
Problems: _____

WASTE TREATMENT JOB BREAKDOWN

Job Description/Daily		Remarks
1) Take sample from Sampler - to lab.	____	
2) Take grab sample from discharge pipe - to lab.	____	
3) Take sample from ditch - to lab.	____	
4) Read flow meter - to lab.	____	
5) Check hypochlorite pump back of building.	____	
a) Run in extra hypochlorite if necessary.	____	
6) Mix up treatment solutions.	____	
a) Lime	____	
b) Caustic Soda	____	
c) Pura Floc	____	
7) Clean up chemical bldgs.	____	
8) Treat cyanide tank, take sample to lab.	____	
a) If fails test, more treatment.	____	
b) If passes, pump out.	____	
c) Resample	____	
9) Treat chrome tank - take sample to lab.	____	
a) If fails test, more treatment.	____	
b) If passes, pump out.	____	
10) Take grab sample of sludge to lab.	____	
11) Record number of cyanide and chrome tanks treated each day.	____	

Job Description/Daily		Remarks
12) Record Number of blowdowns on clarifier each day.	____	
13) Pump Plater pit.	____	
14) Meter copper reduction mixture to cyanide treatment tank.	____	

Monday-Wednesday-Friday

1) Clean Sampler	____	
2) Clean and standardize pH meters (4).	____	
3) Pump shed back of building W. Only.	____	
4) Pump sump back of replate W. Only.	____	

Miscellaneous

1) Clean lime valve.	____	
2) Clean sludge pump pit.	____	
3) Clean flow-through pond.	____	
4) Clean holding tank.	____	
5) Check levels on caustic and hydrochlorine.	____	
6) Clean clarifier.	____	
7) Clean feed pumps & floc line.	____	
8) Clean up spills-acid-copper-etc.	____	
9) Help oil delivery man.	____	
10) Clean sampler discharge pipe.	____	
11) Thaw out frozen pipes.	____	

Lagoons #1, #2/Daily		REMARKS
1) Inspect Fleeboard Level	_____	_____
2) Inspect Vegetation	_____	_____
3) Inspect for leaks, deterioration, or failures in the impoundment.	_____	_____
4) Inspect outfall 001 intake for restrictions	_____	_____
5) Take samples of liquid and solids to lab for analyses	_____	_____

TREATMENT METHODS AND PROCEDURES

1. GENERAL

1.1) FLOW DIAGRAMS 1 THROUGH 6 SHOW THE WASTE WATER FLOW FROM POINT OF ORIGIN TO AND THROUGH THE WASTE TREATMENT PLANT.

1.2) ONCE EACH DAY, CHECK A SAMPLE OF THE DISCHARGE FROM THE SAMPLER FOR THOSE ITEMS SHOWN ON PAGE 2 OF THE PERMIT. NOTE THAT A GRAB SAMPLE, TAKEN AT THE SAME TIME, SHALL BE USED FOR pH, OIL AND GREASE AND TOTAL CHLORINE RESIDUAL.

1.3) BATCH DISCHARGE FROM THE TREATMENT TANKS BEFORE DISCHARGE TO THE CLARIFIER SHALL BE CHECKED FOR THOSE ITEMS SHOWN ON PAGE 4 OF THE PERMIT.

1.4) A SAMPLE OF SLUDGE FROM THE UNDER FLOW OF THE CLARIFIER SHALL BE CHECKED FOR THOSE ITEMS COVERED ON PAGE 5 OF THE PERMIT WEEKLY.

1.5) ONCE EACH MONTH, STARTING SEPTEMBER 1, 1976, A SAMPLE OF THE WATER FROM EACH OF THE STAB WELLS SHALL BE CHECKED FOR THOSE ITEMS SHOWN AT BOTTOM OF PAGE 6 OF THE PERMIT.

1.6) ONCE EACH DAY, RECORD FLOW METER READING.

1.7) CHECK OPERATION OF REACTOR CLARIFIER EACH DAY - MIXER AND SWEEP DRIVE.

1.8) CLEAN pH METERS AS REQUIRED. STANDARDIZE pH METER ONCE EACH WEEK.

1. GENERAL, Continued

1.9) CHECK LIME CIRCULATING PUMP AND THE DE ZURIG VALVE AT THE CLARIFIER EACH DAY.

1.10) CHECK SAMPLER EACH -- CLEAN SUCTION STRAINER AS REQUIRED.

2. CYANIDE TREATMENT

THE FIRST STEP IN THE CYANIDE TREATMENT PROCEDURE IS VERY IMPORTANT. THE DESTRUCTION OF THE CYANIDE.

THE CYANIDE IS DESTROYED (OXIDIZED) WITH SODIUM HYPOCHLORITE. SODIUM HYPOCHLORITE CONTAINS FREE CHLORINE. SODIUM HYPOCHLORITE IS A LIQUID AND IS RUN INTO THE CYANIDE WASTE UNTIL THE TEST FOR FREE CHLORINE IS POSITIVE. AT THIS POINT THE FREE CHLORINE IN THE SODIUM HYPOCHLORITE HAS OXIDIZED, (DESTROYED) ALL THE CYANIDE.

2.1) TWO (2) INDICATORS MAY BE USED TO TEST FOR FREE CHLORINE, THE POINT AT WHICH ALL THE CYANIDE IS DESTROYED.

2.1.1) ORTHO-TOLIDIN TEST

A SOLUTION OF ORTHO-TOLIDIN WILL SHOW A VIVID ORANGE COLOR; WHICH PERSISTS, WHEN A FEW DROPS ARE ADDED TO THE CYANIDE SOLUTION BEING TREATED WITH SODIUM HYPOCHLORITE, WHEN DESTRUCTION OF THE CYANIDE IS COMPLETE. CYANIDE IS STILL PRESENT IN THE SOLUTION BEING TREATED WHEN THE TEST WITH OROTHO-TOLIDIN SHOWS A DIRTY ORANGE COLOR THAT TURNS BLACK AND DISAPPEARS ALMOST IMMEDIATELY. THIS COLOR CHANGE SHOULD NOT BE CONFUSED WITH THE TRUE END POINT (CYANIDE ALL DESTROYED) COLOR, VIVID ORANGE.

2.1.2) POTASSIUM IODIDE STARCH PAPER TEST

THE ORTHO-TOLIDIN TEST, FOR THOSE NOT FAMILIAR WITH THE COLOR CHANGES, IS NOT RELIABLE AND SHOULD ONLY BE USED WHEN TESTING SOLUTIONS LOW IN CYANIDE. THE MOST RELIABLE TEST TO USE TO CHECK FOR FREE CHLORINE IN THE TREATED CYANIDE SOLUTION IS THE POTASSIUM IODIDE STARCH TEST PAPER. THIS TEST PAPER HAS BEEN SATURATED IN A SOLUTION OF POTASSIUM IODIDE AND STARCH. WHEN THIS WHITE PAPER IS DIPPED INTO A SOLUTION CONTAINING FREE CHLORINE, IT TURNS A VERY DARK PURPLE TO BLACK COLOR. TO PERFORM THE TEST, MERELY DIP THE PAPER IN THE CYANIDE SOLUTION TO BE TESTED. A COLOR CHANGE FROM WHITE TO DARK PURPLE OR BLACK INDICATES THAT FREE CHLORINE IS PRESENT AND THE CYANIDE IS DESTROYED.

2.2) THE STEPWISE TREATMENT PROCEDURE FOR DESTRUCTION (OXIDATION) OF CYANIDE IS AS FOLLOWS:

2.2.1) RUN SODIUM HYPOCHLORITE INTO CYANIDE TANK TO BE TREATED UNTIL TEST WITH ORTHO-TOLIDIN SHOWS A VIVID ORANGE COLOR. LET STAND FOR 20 MINUTES; CHECK AGAIN WITH ORTHO-TOLIDIN, IF COLOR IS VIVID ORANGE, PROCEED WITH [2]. IF NO COLOR CHANGE, ADD SODIUM HYPOCHLORITE UNTIL

2.2.1) Continued

VIVID ORANGE. LET STAND 20 MINUTES AND CHECK AGAIN. CONTINUE IN THIS MANNER UNTIL COLOR PERSISTS. PROCEED WITH STEP [2].

2.2.2) CHECK TREATED SOLUTION WITH POTASSIUM IODIDE STARCH TEST PAPER. COLOR CHANGE OF PAPER TO DARK PURPLE OR BLACK INSURES THAT THE CYANIDE IS DESTROYED.

2.2.3) ADD 10 LBS. SODIUM BISULFITE.

2.2.4) ADD 20 LBS FERROUS SULFATE.

2.2.5) RAISE pH TO 10.5-11.0.

2.2.6) ADD 2-3 GALLONS 350-H. ~~1 PW 25~~

2.2.7) AGITATE FOR 1/2-1 HOUR.

2.2.8) PUMP TO POND NUMBER ONE (1). IF THERE IS NO TREATED CHROMIUM TO PUMP TO THE CLARIFIER, PUMP TREATED CYANIDE TO THE CLARIFIER.

2.3) ALTERNATE TREATMENT FOR CYANIDE DETRUCTION.

2.3.1) FOLLOW TREATMENT STEPWISE, STARTING WITH 2.2.1 THROUGH 2.2.3.

2.3.2) ADD 5 LBS SODIUM HYDROSULFITE.

2.3.3) ADD 2-3 QTS. NO. 114. AGITATE FOR 15 MINUTES.

2.3.4) ADD 15-20 LBS. ALUMINUM SULFATE. AGITATE 15 MINUTES.

2.3.5) RAISE pH TO 10.5-11.0. AGITATE

2.3.6) PUMP TO POND NUMBER ONE (1). IF THERE IS NO TREATED CHROMIUM TO PUMP TO CLARIFIER THEN PUMP TREATED CYANIDE TO THE CLARIFIER.

3. CHROMIUM TREATMENT

3.1) LOWER pH TO 3.5 - 4.0 WITH SULFURIC ACID. ADD SODIUM BISULFITE UNTIL COLOR CHANGES FROM YELLOW TO BLUE. 400 LBS. OF SODIUM BISULFITE IS USUALLY ENOUGH. THEN ADD 10 LBS. SODIUM HYDROSULFITE. PUMP TO CLARIFIER AS SLOWLY AS POSSIBLE.

3.2) TO CHECK FOR COMPLETE REDUCTION OF CHROMIUM, PROCEED AS FOLLOWS: TO A SMALL SAMPLE OF THE TREATED SOLUTION IN A BEAKER, ADD A LITTLE LIME, SHAKE, THEN ADD A FEW GRANULES OF A-22 FLOC. POUR CLEAR LIQUID INTO A TEST TUBE, ADD 5 DROPS SULFURIC ACID THEN 10 DROPS CHROMIUM INDICATOR. A CHANGE IN COLOR, PINK TO PURPLE, INDICATES CHROMIUM IS NOT COMPLETELY REDUCED.

4. CLARIFIER

4.1) SET pH METER AT 9.6 FOR ALL PRODUCTION DAYS AND TANK MAINTENANCE DAY. SET pH METER BACK TO 8.5 LATE NIGHT OF LAST PRODUCTION AND AT END OF TANK MAINTENANCE DAY.

5. NEUTRALIZATION CHAMBER

5.1) SET pH METER AT 9.6.

6. FLOC FEEDERS

6.1) SET FEEDER AT 100% FOR ALL PRODUCTION DAYS. FILL TANK LATE THE NIGHT OF EACH PRODUCTION DAY AND END OF TANK MAINTENANCE DAY.

7. LIME SLURRY TANK

7.1) MAKE UP A FULL TANK LATE THE NIGHT OF EACH PRODUCTION DAY AND AT END OF TANK MAINTENANCE DAY. THIS IS VERY IMPORTANT.

8. LIQUID CAUSTIC FEED TANK

8.1) MAKE UP A FULL TANK LATE THE NIGHT OF EACH PRODUCTION DAY AND END OF TANK MAINTENANCE DAY.

9. SMALL LIQUID CAUSTIC FEED TANK

9.1) MAKE UP A FULL TANK LATE THE NIGHT OF EACH PRODUCTION DAY AND END OF TANK MAINTENANCE DAY.

10. CHEMICAL MAKE-UP

10.1) LIME SLURRY

10.1.1) USE 400 LBS. LIME FOR MAKE-UP.

10.1.2) USE 5 LBS. LIME PER INCH FOR MAINTENANCE.

10.2) FLOC TANK

10.2.1) 2 CUPS FLOC (3 OZ.) PURIFLOC A-22 PER 16 INCHES. SMALL FEEDER.

10.2.2) 3 CUPS FLOC FOR LARGE FEEDER.

10.3) CAUSTIC SODA FEED TANK

10.3.1) MAKE UP WITH ONE PART LIQUID CAUSTIC TO ONE PART WATER IN WINTER.

10.3.2) MAKE UP WITH FULL STRENGTH LIQUID CAUSTIC IN SUMMER.

10.4) SMALL CAUSTIC FEED TANK

10.4.1) MAKE UP WITH 25% LIQUID CAUSTIC SODA.

TREATMENT METHODS & PROCEDURES, CONTINUED

11. THERE MUST BE A SUPPLY OF THESE ITEMS IN THE PUMP HOUSE AT ALL TIMES.

11.1) pH PAPERS -- 6-8, 8-9.5, 10-12

11.2) OTHO-TOLIDIN

11.3) POTASSIUM IODIDE STARCH TEST PAPERS

11.4) CHROME INDICATOR

11.5) DEFOAMER

S[illegible] Die Casting Division
Hoo[illegible]r Universal, Inc.
232 Monroe Street
Saline, Michigan 48176
Tel. (313) 429-9411

MID 980 795 512

HOOVER UNIVERSAL

December 3, 1982

Mr. Chuck Bikfalvy
Water Quality Specialist
Department of Natural Resources
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

RECEIVED
DEC 06 1982
WATER QUALITY DIV.
DIST. I

Dear Mr. Bikfalvy:

In answer to your memorandum of October 19, 1982, I answer the deficiencies you noted (during your inspection of September 1) as follows:

1) We have no training records because our people were trained prior to Act 265.16 (RCRA of 1976).

   We are setting up a training procedure whereby the people will be checked twice per year (Jan. 1 & June 1) to make sure they are aware of the current procedures.

2) An emergency equipment list is being added to our contingency plan, including location, description and capability of each item, as required by 265.52 (3).

3) A written sampling procedure and an updated analysis plan is being implemented as required by 265.92 (a).

4) Estimated plant closure date of the year 2000 was added to our closure plan as required by 265.112 (a) (4).

Sincerely yours,

HOOVER UNIVERSAL, INC.
Die Casting Division/Saline

William J. Tischler
Technical Director

jm

MID 980 [illegible] 512

GE 12-1-83
Code O

RCRA Inspection Report

EPA Identification Number: M I T 2 7 0 0 1 9 7 7 1

Installation Name: HOOVER UNIVERSAL - SALINE DIE CASTING DIVISION

Location Address: 232 Monroe Street

City: Saline State: Michigan 48176

Date of inspection: 9-20-83 Time of inspection (from) 11:00 (to) 11.30

Person(s) interviewed	Title	Telephone
WILLIAM J. TISCHLER	Technical Director	(313) 429-9411

Inspector(s)	Agency/Title	Telephone
HIEN Q. NGUYEN	Mich DNR/Env. Eng.	(517) 322-1687

Installation Activity (mark only one box)

Inspection Form(s)

- [X] ~~Treatment~~/Storage/~~Disposal~~ per 40 CFR 265.1 and/or Generation ~~and/or Transportation~~ — A See Remarks
- [ ] II Treatment/Storage/Disposal (no generation or Transportation) — A
- [ ] II Generation and Transportation — B, C
- [ ] II Generation only — B
- [ ] II Transportation only — C

Remarks: This was a follow-up inspection regarding items listed in my August 2, 1983 letter.

Most of the deficiencies listed in my May 5, 1983 letter from the previous inspection have been corrected properly. However, at the time of the inspection, the groundwater monitoring report (prepared by a consulting firm) was not complete yet.

Note: Mr. Tischler contacted my office on October 19, 1983 and confirmed that the groundwater monitoring report just complete and sent to EPA & Mich. DNR.

Except their groundwater monitoring systems which will be evaluated later in November (attached), the facility has corrected all the deficiencies.

(4-82B)

February 29, 1984

Mr. William J. Tischler
Hoover Universal Inc.
232 Monroe Street
Saline, Michigan 48176

MID980795512

Dear Mr. Tischler:

As part of our FY84 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all major hazardous waste treatment storage and disposal facilities (TSDFs) in the State. All TSDFs which are licensed under 1979 P.A. 64, as amended, and those which are subject to the RCRA part 264/265 Subpart F groundwater monitoring requirements are defined as a major facility. EPA and the Department have also identified additional "major" facilities on the basis of the type and quantity of waste treated generated or disposed of.

Your facility is considered a "major" facility. Therefore, please submit two up-to-date copies of your closure/post closure plans for your hazardous waste activities by March 15, 1984.

The plans should be sent to the following address:

Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30038
Lansing, Michigan 48909

If you have questions regarding this letter, please contact Mr. Alan Howard, Chief of our Technical Services Section at 517-373-2730.

Sincerely,

Delbert Rector, Chief
Hazardous Waste Division
517-373-2730

cc: U.S. EPA
District, Bob Basch

JAMES F. CLEARY, Acting Director

August 2, 1983

Mr. William J. Tischler, Technical Director
Hoover Universal, Inc.
Saline Die Casting Division
232 Monroe Street
Saline, Michigan 48176

MID 980 795 512

Re: RCRA Inspection

Dear Mr. Tischler:

This is to acknowledge receipt of your letter and documents dated July 19, 1983, regarding the deficiencies as outlined in my May 5, 1983 letter. The information submitted; however, did not address the following items:

1. Job titles and job descriptions as required in 40 CFR 265.16 (d)(1) and (2).

2. Records as required in 40 CFR 265.94.

We intend to conduct a follow-up inspection in the first week of September 1983 to re-evaluate compliance of your facility with requirements of 40 CFR 265.16(d), 265.73, and 265.94 (attached).

If you have any questions, please call me at (517) 322-1687.

Sincerely,

HAZARDOUS WASTE DIVISION

Hien Q. Nguyen
Environmental Engineer

HQN/slp

cc: Bohunsky/Hazardous Waste Div.
U.S. EPA - Region V

Attachment

Saline Die Casting Division
Hoover Universal, Inc.
232 Monroe Street
Saline, Michigan 48176
Tel. (313) 429-9411

HOOVER UNIVERSAL

July 19, 1983

Mr. Hien Q. Nguyen
Environmental Engineer/Lansing District
Michigan Department of Natural Resources
Stevens T. Mason Building
P.O. Box 30028
Lansing, Michigan 48909

Dear Mr. Nguyen:

In response to your letter dated May 5, 1983, regarding RCRA inspection for Saline Die Casting Division (MIT 270019771), I enclosing the information you require.

We also have the following in-plant safety equipment:

One Lincoln Welder portable generator (5,000 Watts)

Two self-contained artificial breathing units

Fire safety equipment list, attached.

If you have any questions, give me a call.

Sincerely yours,

HOOVER UNIVERSAL, INC.
Die Casting Division/Saline

William J. Tischler
Technical Director

jm

Attached: Inspection Schedule
Waste Treatment/Procedures & Methods Test
List of Fire Brigade Members
Fire Brigade Responsibilities & Duties List
Layout/Plant Fire Extinguishers

Sent w/ previously submitted inspection 6-10-83 JES

Die Casting Division
232 Monroe Street
Saline, Michigan 48176
(313)429-9411

HOOVER UNIVERSAL

May 23, 1983

MID980795512

Hien Q. Nguyen, Environmental Engineer
Michigan Department of Natural Resources
Stevens T. Mason Building
P.O. Box 30028
Lansing, Michigan 48909

Dear Mr. Nguyen:

In reference to RCRA inspection for Hoover Universal's Saline Die Casting Division, permit number ~~MIT 270019771~~.

Per your letter of May 5, please extend compliance return letter to Thursday, June 30, 1983.

Thank you.

Sincerely yours,

HOOVER UNIVERSAL, INC.
Die Casting Division/Saline

William J. Tischler
Technical Director

jm

RECEIVED
Water Qual.-Dist. II

this was sent previously recorded in my log as #1553, but I did not see it on 5/16/83 print-out.

Oliver - Previously Submitted. Dup? JST.

Goldin 6/10/83 also letter that came in is attached.

May 5, 1983

MID 980795 512

Mr. William J. Tischler, Technical Director
Hoover Universal, Inc.
232 Monroe Street
Saline, Michigan 48176

Re: RCRA Inspection - Hoover Universal
Saline Die Casting Division
MIT 270019771

Dear Mr. Tischler:

On March 31, 1983, staff of the Department of Natural Resources conducted an inspection of the referenced facility to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

The following summary outlines the deficiencies found during the above inspection:

1. The written inspection schedule as specified in 40 CFR 265.15(b) (1), (2), (3), and (4) was not available at the facility.

2. An inspection log or summary was not available as required by 40 CFR 265.15(d).

3. Personnel training records were not available at the facility as required by 40 CFR 265.16(d) (1), (2), (3), and (4).

4. The operating record did not contain sufficient information as specified in 40 CFR 265.73.

5. The facility currently has a Pollution Incident Prevention Plan (PIPP). However, to comply with the requirements of 40 CFR 265.52, the facility needs to amend that plan to incorporate a list of all emergency equipment and an evacuation plan as specified in 40 CFR 265.52(e) and (f).

We request that you respond to this letter by May 23, 1993, providing documentation to this office regarding those actions taken to correct these violations. Please also send us a copy of your groundwater monitoring report as specified in 40 CFR 265.94(a)(2)(ii), and (iii) for our information.

Enclosed is a copy of the inspection report. If you have any questions or need any information, please do not hesitate to call me at (517) 322-1067.

Sincerely,

HAZARDOUS WASTE DIVISION

Hien Q. Nguyen
Environmental Engineer
Lansing District

HQN/[illegible]

[illegible]

cc: [illegible]
U.S. EPA - Region V

Violation III
Code X
YES 5-17-83

#

RCRA Inspection Report

EPA Identification Number: M I T 2 7 0 0 1 9 7 7 1

Installation Name: HOOVER UNIVERSAL Inc

Location Address: 232 Monroe St

City: Saline State: MICHIGAN 48176

Date of inspection: 3-31-83 Time of inspection (from) 1:30 PM (to) 4:30 PM

Person(s) interviewed	Title	Telephone
WILLIAM J. TISCHLER	TECH DIRECTOR	313 429-9711

Inspector(s)	Agency/Title	Telephone
RICK LUNDGREN	Mich DNR / District Supervisor	(517) 322-1300
IREN NGUYEN	Mich DNR / Env. Eng.	(517) 373-1687

Installation Activity (mark only one box) — Inspection Form(s)

- [X] Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation — (A)
- [ ] Treatment/Storage/Disposal (no generation or Transportation) — A
- [ ] Generation and Transportation — B, C
- [ ] Generation only — B
- [ ] Transportation only — C

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	☐	storage in containers	I
S02	☐	storage in tanks	J
T01	☐	treatment in tanks	J
S04	☑	storage in surface impoundment	K,F
T02	☐	treatment in surface impoundment	K,F
D83	☐	disposal in surface impoundment	K,F
S03	☐	storage in waste pile	L
D81	☐	disposal by land application	M,F
D80	☐	disposal in landfill	N,F
T03	☐	treatment by incineration	O/P
T04	☐	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	☑	APPENDIX	GN
TRANSPORTER	☐	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

Either S04 or T02 (Storage or treatment in surface impoundments)

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

None

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	N/A			
b. Facility expansion?				
c. Change of owner or operator?				
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	N/A			No hazardous waste from off-site sources
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance? or	✓			
b. i. Artificial or natural barrier around facility? and	✓			
ii. Controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?		✓		the written schedule was not available at the time of the inspection.
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				All items are inspected but no written schedule available
ii. safety and emergency equipment?				
iii. security devices?				
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?				
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?				
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?				
d. Are areas subject to spills inspected daily when in use?	✓			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?		✓		not available
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?				
ii. the name of the inspector?				
iii. a notation of the observations made?				
iv. the date and nature of any repairs or remedial actions?				
5. Do personnel training records include: 265.16				not available at the facility
a. Job titles?				
b. Job descriptions?				

	YES	NO	NI	Remarks
c. Description of training?				
d. Records of training?				
e. Did facility personnel receive the required training by 5-19-81?	✓			
f. Do new personnel receive required training within six months?				
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?				
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17	N/A			No ignitable, no reactive or incompatible waste
a. Special handling?				
b. No smoking signs?				
c. Separation and protection from ignition sources?				

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

		YES	NO	NI	Remarks
1.	Maintenance and Operation of Facility: 265:31 Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2.	If required, does the facility have the following equipment: 265.32				
	a. Internal communications or alarm systems?	✓			
	b. Telephone or 2-way radios at the scene of operations?	✓			
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

54,000 gallons of water

200 Foam extinguishers

3.	Testing and Maintenance of Emergency Equipment: 265.33				
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
	b. Is emergency equipment maintained in operable condition?	✓			
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	✓			
5.	Is there adequate aisle space for unobstructed movement?	✓			
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			The owner presently has only a Pollution Incident Prevention Plan (PIPP)
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		✓		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		✓		in the fire prevention plan
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	✓			

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	N/A			none has occurred

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
* 1. Use of Manifest System 265.71				N/A
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	
b. Are records of past shipments retained for 3 years?	—	—	—	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	—	
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	the facility has a good operating record for the plating treatment process. However, it does not contain sufficient info. regarding haz. waste as specified and required by 40 CFR 265.73
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	—	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	—	—	—	
***iii. A map or diagram of each cell or disposal area				

** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	N/A			not a disposal facility
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			
v. Reports detailing all incidents that required implementation of the Contingency Plan?				
vi. All closure and ~~post closure~~ costs as applicable?	✓			
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?		✓		
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?				N/A
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	✓			
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?		✓		
If "yes", skip to number 12. If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	✓			
Indicate the total number of up-gradient wells.	two (2)			
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	✓			
Indicate the total number of downgradient wells.	five (5)			
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	✓			

Sketch the locations of the wells relative to the waste management area.

See attached graph

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	✓	—	—	
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?	✓	—	—	
b. Sample preservation and shipment?	✓	—	—	
c. Analytical procedures?	✓	—	—	
d. Chain of custody control?	✓	—	—	
5. Does the owner or operator follow his groundwater sampling and analysis plan?	✓	—	—	
6. Is the groundwater sampling and analysis plan maintained at the facility?	✓	—	—	
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?	✓	—	—	

	YES	NO	NI	Remarks
8. Has the owner or operator developed an outline of a comprehensive groundwater quality assesment program that is capable of determining: 262.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?				BEING DONE BY J & A consultants
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?				
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?				
*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?			X	
*10. Was there a statistically significant increase (or pH decrease) detected in any well?			X	
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			X	
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?		✓		N/A
a. Is the waiver demonstration maintained at the facility?				
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				
Note: Inspectors should request a copy of the waiver document.				
c. Skip questions 12, 13, and 14.				

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	—	✓	—	
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	N/A	—	—	

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	N/A	—	—	
14. Does the owner or operator submit reports and maintain records as required in 265.94?	—	—	—	

Section G CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	✓			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	✓			
ii. maximum hazardous waste inventory?	✓			
iv. estimated year of closure?	✓			approx. 2000
v. schedule of closure activities?	✓			
c. Has closure begun?		✓		
*2. Post-Closure 265.118				N/A
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - US_ AND MANGEMENT OF CONTAINERS (P t 265, Subpart I)

		YES	NO	NI	Remarks
1.	Are containers in good condition? 265.171	✓			there are only
2.	Are containers compatible with waste in them? 265.172	✓			two dumpsters which
3.	Are containers managed to prevent leaks? 265.173	✓			contain filter cakes
4.	Are containers stored closed?	✓			which are generated
5.	Are containers inspected weekly for leaks and defects.	✓			by the treatment process of plating solutions.
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	N/A			non flammable non reactive
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177				no incompatible waste
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				No tanks
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
5. Are required daily and weekly inspections done? 265.194				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)				

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____gallons

Tank diameter: _____feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	✓			
2. Do earthen dikes have protective covers? 265.224	✓			grass cover
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	NA			
4. Is the freeboard level inspected at least daily? 265.226	✓			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	✓			
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	NA			
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	NA			

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

Section M - LAND TREATMENT (Part 265, Subpart M)

		YES	NO	NI	Remarks
1.	Is treated hazardous waste capable of biological or chemical degradation? 265.270	___	___	___	_____
2.	Are run-off and run-on diverted from the facility or collected				
3.	Is waste analyzed according to 265.273?	___	___	___	_____
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	_____
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	___	___	___	_____
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	_____
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	___	___	___	_____
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	___	___	___	_____
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	___	___	___	_____

Section N - LANDFILLS (Part 265, Subpart N)

	YES	NO	NI	Remarks
1. General Operating Requirements 265.302 Does the facility provide the following:				
a. Diversion of run-on away from active portions of the fill?	___	___	___	_____
b. Collection of run-off from active portions of the fill?	___	___	___	_____
c. Is collected run off treated?	___	___	___	_____
d. Control of wind dispersal of hazardous waste?	___	___	___	_____
2. Surveying and Recordkeeping 265.309 Does the Operating Record Include:				
a. A map showing the exact location and dimensions of each cell?	___	___	___	_____
b. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312	___	___	___	_____
4. Special Requirements for Incompatible Wastes. 265.313 Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

	YES	NO	NI	Remarks
5. Special requirements for liquid waste 265.314				
a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.				
i. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
ii. Does the landfill have a functional leachate collection system?	___	___	___	_____
iii. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
b. Have containers holding free liquids been placed in landfill since March 22, 1982?	___	___	___	_____
6. Special requirements for Containers 265.315 Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR t 265, Subparts O and P)

1. Determination of Steady State I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
_____	___	___	___	_____
_____	___	___	___	_____
_____	___	___	___	_____
_____	___	___	___	_____
_____	___	___	___	_____

2. Waste Analysis I 265.345 T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value	___	___	___	_____
Halogen content	___	___	___	_____
Sulfur content	___	___	___	_____

ii. Has documented or written data been substituted for analysis of either:

Lead?	___	___	___	_____
Mercury:	___	___	___	_____

b. List other paramters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. Monitoring and Inspections I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
b. Is steady state maintained or corrections attempted?	___	___	___	_____
c. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
d. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____

**Specify in Remarks for what period of time this was checked.

g. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____
4. Open Burning T 265.382 (open burning does not apply to incineration)				
a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).	___	___	___	_____

	YES	NO	NI	Remarks
ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	___	___	___	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 25				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of Generator	✓			
c. Name and EPA ID Number of Transporter(s)?	✓			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. NONE

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. NONE

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	✓			
3. If required, are placards available to transporters of hazardous waste? 262.33	✓			Usually haulers provide their own

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☑ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50	N/A			

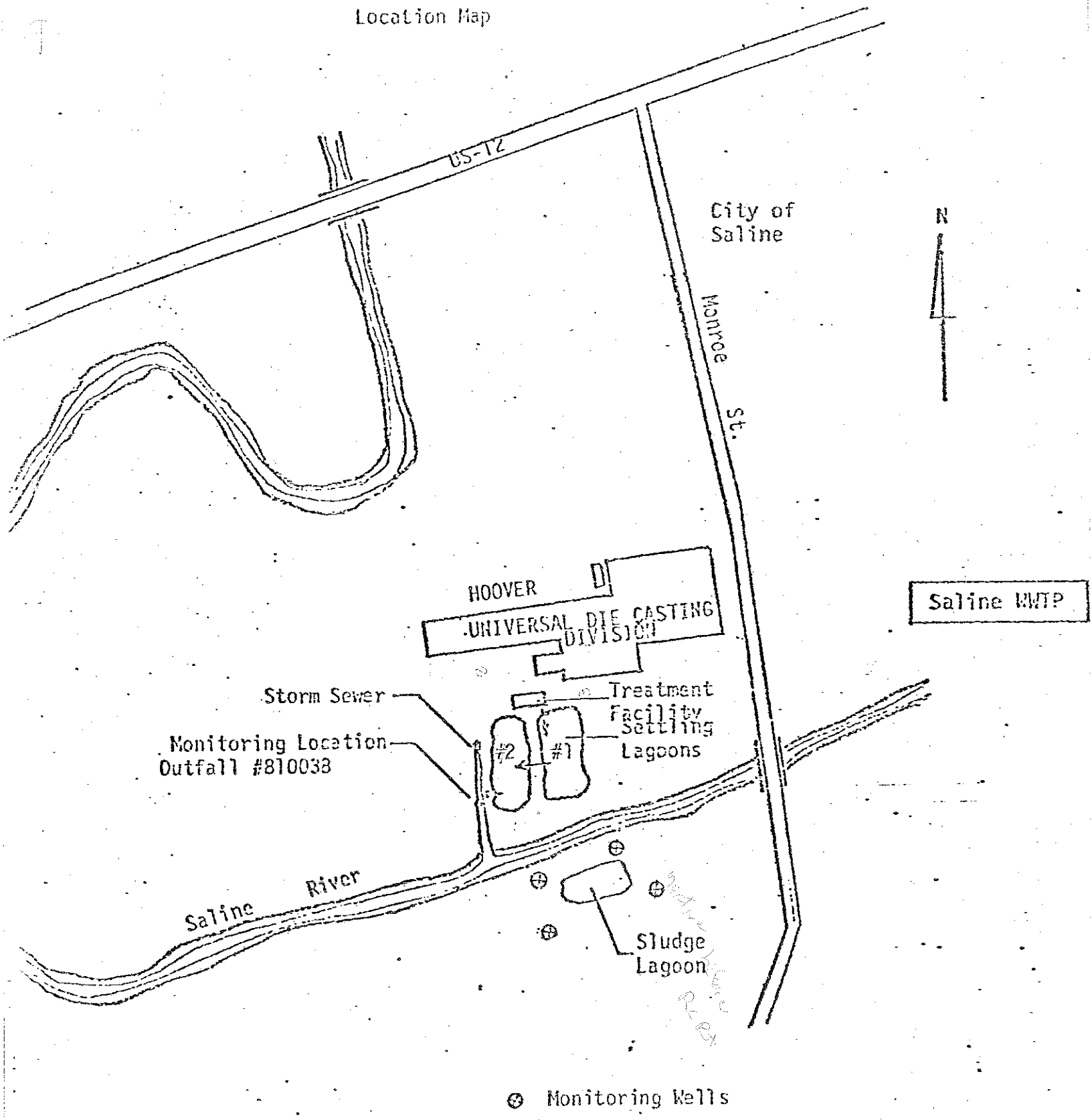
(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:

	YES	NO		Remarks
i. Notified the Administrator in writing?	___	___	___	_____
ii. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	___	___	___	_____
iii. Met the Manifest requirements?	___	___	___	_____
b. Importing Hazardous Waste; has the generator met the manifest requirements?	___	___	___	_____

	YES	NO	NI	Remarks
Section A: SCOPE:				
1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.				N/A
2. Does the transporter transport hazardous waste into the U.S. from abroad?				
3. Does the transporter transport hazardous waste out from the U.S.?				
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?				
Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)				
1. Are copies of completed manifests available for review and retained for three years. 263.22				
2. Estimate the number of manifests for shipments completed during the part 6 months.				
3. Examine a representative number of manifests. Indicate number examined.				
4. Did transporter properly sign and date the manifests examined?				
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21				
If (5) is "no," skip 6 and 7.				
6. Do any manifests indicate shipments delivered to other than an alternate facility?				
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?				

Figure 2 Hoover Universal, Inc. - Saline Die Casting Division



STATE OF MICHIGAN

EPA

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

1078

October 19, 1982

CERTIFIED MAIL

Mr. William J. Tischler,
Technical Director
Hoover Universal, Inc.
Saline Die Casting
232 Monroe Street
Saline, Michigan 48176

Dear Mr. Tischler:

On September 1, 1982, I inspected your facility for compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. A copy of my report is attached for your use.

The following deficiencies were noted during the inspection:

1. There were no training records available at the facility, as required by 265.16.

2. Your contingency plan did not include a list of emergency equipment, including location, description and capability of each item, as required by 265.52(3).

3. There was no written sampling and analysis plan at the facility, as required by 265.92(a).

4. Your closure plan did not include the estimated year of closure, as required by 265.112(a)(4).

Please respond in writing by November 26, 1982 detailing actions taken to correct the deficiencies noted above. Also, please feel free to

contact me at (313) 675-0860, if you have any questions pertaining to hazardous waste management.

Sincerely,

WATER QUALITY DIVISION

Roy E. Schrameck, P.E.

Chuck Bikfalvy

By: Chuck Bikfalvy
Water Quality Specialist

RES:CB/sc

Enclosure

cc: Al Howard, OHWM (2)
file

#1078

RCRA Inspection Report

EPA Identification Number: MIT 270019721

Installation Name: HOOVER UNIVERSAL INC. SALINE DIE CASTING

Location Address: 232 MONROE ST.

City: SALINE State: MICH. 48176

Date of inspection: 9/1/82 Time of inspection (from) 10:15 (to) 1:00

Person(s) interviewed	Title	Telephone
WILLIAM S. TISCHLER	TECH. DIRECTOR	(313) 429-9411

Inspector(s)	Agency/Title	Telephone
C. BIKFALVY	MDNR WQSD/B	(313) 675-0860

Installation Activity (mark only one box) — Inspection Form(s)

- [X] Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation — A
- [ ] Treatment/Storage/Disposal (no generation or Transportation) — A
- [ ] Generation and Transportation — B, C
- [ ] Generation only — B
- [ ] Transportation only — C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	☐	storage in containers	I
S02	☑	storage in tanks	J
T01	☑	treatment in tanks	J
S04	☑	storage in surface impoundment	K,F
T02	☐	treatment in surface impoundment	K,F
D83	☐	disposal in surface impoundment	K,F
S03	☐	storage in waste pile	L
D81	☐	disposal by land application	M,F
D80	☐	disposal in landfill	N,F
T03	☐	treatment by incineration	O/P
T04	☐	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	☑	APPENDIX	GN
TRANSPORTER	☐	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

S04

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?			✓	NA - DO NOT RECIEVE
b. Facility expansion?			✓	NA
c. Change of owner or operator?			✓	NA - NO CHANGE
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓			WASTE CHARACTERIZATION ONCE AYR.
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance? or	✓			
b. i. Artificial or natural barrier around facility? and	✓			
ii. Controlled entry?	✓			
c. Danger sign(s) at entrance?				
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	✓			MONTHLY SAFETY INSPECTION, UNDOCUMENTED DAILY INSPECTION OF DISCHARGE
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	✓			
ii. safety and emergency equipment?	✓			MONTHLY
iii. security devices?	✓			DONE BY GUARD SERVICE
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	✓			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	✓			NOT RECORDED
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?				DAILY
d. Are areas subject to spills inspected daily when in use?	✓			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	✓			SAFETY INSPECTION + GUARD INSPECTION
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			WORK ORDERS
5. Do personnel training records include: 265.16				
a. Job titles?		✓		NO RECORDS. ALL TRAINING IS INFORMAL, ON-THE JOB.
b. Job descriptions?			✓	

	YES	NO	NI	Remarks
c. Description of training?	___	___	✓	
d. Records of training?	___	___	✓	
e. Did facility personnel receive the required training by 5-19-81?	___	___	✓	
f. Do new personnel receive required training within six months?	___	___	✓	
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?			✓	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17			✓	NA - NOT IGNITABLE, REACTIVE, OR INCOMPATIBLE.
a. Special handling?	___	___	___	
b. No smoking signs?	___	___	___	
c. Separation and protection from ignition sources?	___	___	___	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	YES	NO	NI	Remarks
1. Maintenance and Operation of Facility: 265.31 Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	✓	~~✓~~		STACK CAUGHT ON FIRE 1YR AGO, PUT OUT PROMPTLY.
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			TELEPHONES, PAGING SYSTEM
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

54,000 GALLONS IN TOWER FOR SPRINKLERS

200 FOAM EXTINGUISHERS

3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment maintained in operable condition?	✓			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	✓			
5. Is there adequate aisle space for unobstructed movement?	✓			
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			FIRE DEPT & WASTEWATER TREATMENT PLANT

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				PITT. ALSO HAVE SEPARATE FIRE PLAN
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			HAVE ARRANGEMENTS WITH LOCAL AGENCIES INCLUDING CONTRACT WITH WWTP BUT NOT IN PLAN. CONTRACTORS FOR CLEANUP & HAULING LISTED IN PLAN.
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		✓		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓			BRIEF DISCUSSION IN FIRE PLAN, BUT SIGNALS, ROUTES NOT INCLUDED
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53		✓		

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			✓	NA - NONE OCCURRED

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71			✓	NA
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	
b. Are records of past shipments retained for 3 years?			✓	
	—	—	—	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72			✓	NA
	—	—	—	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.			✓	NA
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	—	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	—	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	—	—	—	
***iii. A map or diagram of each cell or disposal area			✓	NA

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			✓	NA
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?			✓	NA
v. Reports detailing all incidents that required implementation of the Contingency Plan?			✓	NA
vi. All closure and post closure costs as applicable?			✓	NA
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	✓			
5.**Unmanifested Waste Reports 265.76			✓	NA
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?				
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90 If "no", Skip to number 11.	✓			J+A NOW DOING HYDROGEO STUDY, 5 NEW WELLS IN (JUNE 82)
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)? If "yes", skip to number 12. If "no", continue	NA	✓		NEW HYDROGEO STUDY NOW IN PROGRESS, HOWEVER
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area? Indicate the total number of up-gradient wells.	✓			TWO
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area? Indicate the total number of downgradient wells.	✓			NOW HAVE 5 BUT BEFORE JUNE '82 HAD ONLY 2
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	✓			ORIGINALLY APPROVED BY DNR

Sketch the locations of the wells relative to the waste management area.

SKETCH IS ATTACHED, (PROVIDED BY CO.) INCLUDES ONLY ORIGINAL FOUR WELLS..

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	✓			DIAGRAMS NOW AT J+A, BUT ORALLY DESCRIBED AS MEETING THESE REQUIREMENTS
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?		✓		CO. DOES OWN SAMPLING AND ANALYSIS. PROCEDURE NOT WRITTEN DOWN
b. Sample preservation and shipment?				
c. Analytical procedures?				
d. Chain of custody control?				
5. Does the owner or operator follow his groundwater sampling and analysis plan?			✓	
6. Is the groundwater sampling and analysis plan maintained at the facility?			✓	
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?	✓			NOT REQUIRED FOR ORIGINAL WELLS WHEN FIRST INSTALLED, BUT NOW BEING DONE BY J+A FOR NEW STUDY.

	YES	NO	NI	Remarks
8. Has the owner or operator developed an outline of a comprehensive groundwater quality assesment program that is capable of determining: 262.93		✓		BUT BEING DONE BY J+A
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?	✓			
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	✓			
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?	✓			
*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?			X	
*10. Was there a statistically significant increase (or pH decrease) detected in any well?			X	
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			X	
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?		✓		
a. Is the waiver demonstration maintained at the facility?				
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	—	✓	—	
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	—	—	—	

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	—	—	—	
14. Does the owner or operator submit reports and maintain records as required in 265.94?	—	—	—	

Section G - _OSURE AND POST CLOSURE (Part 5 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	✓			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	✓	✓		
ii. maximum hazardous waste inventory?	✓			HAVE INVENTORY. PLAN WAS DEVELOPED BASED ON MAX.
iv. estimated year of closure?		✓		
v. schedule of closure activities?	✓			
c. Has closure begun?		✓		
*2. Post-Closure 265.118			✓	NA
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section J - TANKS (Part 265, Subpart J)

		YES	NO	NI	Remarks
1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	✓			
2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓			
3.	Do continuous feed systems have a waste-feed cutoff?			✓	NA - ALL BATCH SYSTEMS
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193			✓	NA
5.	Are required daily and weekly inspections done? 265.194	✓			
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)			✓	NA - NOT IGNITABLE OR REACTIVE
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			CN AND ACID WASTES SEPARATE

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

NA

Tank capacity: _____gallons

Tank diameter: _____feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

		YES	NO	NI	Remarks
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	✓			
2.	Do earthen dikes have protective covers? 265.224	✓			Vegetation
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225			✓	NA
4.	Is the freeboard level inspected at least daily? 265.226		✓		NOTHING IS BEING ADDED
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	✓			
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229			✓	NA
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230			✓	NA

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 28	– SOME ARE NON-HAZARDOUS (ACT 136) WASTES			
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of Generator	✓			
c. Name and EPA ID Number of Transporter(s)?	✓			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. 0

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30			✓	SHIPPED IN BULK
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32			✓	NOT IN PACKAGE
3. If required, are placards available to transporters of hazardous waste? 262.33	✓			HAULER HAS OWN ALSO CO. HAS SOME

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☐ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?			✓	NOT IN CONTAINERS
b. Have more than 90 days elapsed since the date inspected in (a)?			✓	
c. Do wastes remain in accumulation tanks for more than 90 days?		✓		
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?		✓		NA-UNDERGROUND

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50		✓		

(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator: